UNITED STATES FDA

FSVP

COMPLIANCE PLAN

GRAZA | DRUPLEY INC.

Name of FSVP Importer

ACEITES DEL SUR-COOSUR, S.A., FÁBRICA VILCHES

Name of Foreign Supplier

"FRIZZLE" HIGH HEAT COOKING OIL PRODUCT-LINE

Name of Product-line

DECEMBER 22, 2024

Date of Initial Verification / Re-verification

DECEMBER 26, 2025

Date of Plan Expiration

VERIFICAITON COMPLETE | APPROVED FOR IMPORT

Result of Verification

NUMBER 01

Version

– Confidential –

– CONTENT –

OVERVIEW *of* FSVP PLAN

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

INSTRUCTIONS *for* USE

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

TERMS & DEFINITIONS

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

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

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

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

RULES *of* USE

FOREIGN SUPPLIER VERIFICATION PROCEDURES

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

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

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

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

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

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FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

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

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

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

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

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

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

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

Continued onto next page.

FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

It may be required that the FSVP Importer conduct or obtain documentation of other; not previously mentioned; appropriate supplier verification activity*(ies)* based on the foreign supplier's performance and the risk associated with the food. If required, notation will be recorded on the enclosed FSVP Document Checklist and/ or Initial and/or Ongoing Verification Activities, and a copies of these activity*(ies)* will be included within this FSVP plan.

FREQUENCY *of* VERIFICATION PROCEDURES

All foreign supplier verification procedures and activities will be conducted and/or re-conducted at a frequency appropriate to the relevant procedure/activity and the corresponding hazard profile for the relevant food. Please refer to document-specific notes found on page eleven, Ongoing Document Requirements found on page twelve, and Ongoing Verification Activities & Frequency of Ongoing Verification Activities found on page fourteen.

USE *of* APPROVED SUPPLIERS ONLY

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

CORRECTIVE ACTIONS

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

IDENTIFICATION *of* FSVP IMPORTER

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

UNITED STATES CODE *of* FEDERAL REGULATIONS

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

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

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

21 C.F.R. §1.500–§1.514

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

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

NOTES & COMMENTS

FSVP 21 CFR §1.500–§1.514

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

Graza relies on the foreign supplier to control all identified biological, chemical, and physical hazards prior to U.S. entry. Graza periodically validates the efficacy of the foreign supplier's controls by directing per lot samples to be tested by an independent, third-party laboratory. Per Graza's "Testing Requirements" (see policy attached) testing must take place before oil is paid for or picked up from farm partners. Once oil is approved, oil can be transported to bottling facilities.

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ATTESTATION *of* REVIEW & ASSESSMENT

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

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

its contents to be acceptable.

Reviewer's Name: _____

Reviewer's Signature: _____

Reviewer's Title: _____

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

DESIGNATION *of* ROLES & SUMMARY *of* REVIEW

FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: Drupley Inc. dba: Graza FDA FEI: N/A

Physical Address: 185 Wythe Avenue, 2nd Floor DUNS No.: 118423765

City: Brooklyn State: New York, 11249 Country: United States

Mailing Address: 218 Cedrus Avenue

City: East Northport State: New York, 11731 Country: United States

Phone Number: +1 (929) 319-6363 Email Address: laura@graza.co

Name *of* Representative*(s)*: Ms. Laura Romano Title: Commercial Rep.

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

Company Name: Aceites Del Sur-Coosur, S.A., Fábrica Vilches FDA FFR: 13622859374

Manufacturing Address: Carretera de La Carolina, km 29 FDA FEI: 3010677724

City: Vilches Province/Territory: Jaén, 23220 Country: Spain

Office Address: Carretera de La Carolina, km 29

City: Vilches Province/Territory: Jaén, 23220 Country: Spain

Phone Number: +34 953 631 165 Email Address: jmgonzalez@acesur.com

Name *of* Representative*(s)*: Mr José Manuel González Title: Commercial Rep.

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

Agent/QI Name: Claudio Innocenti Signature: Claudio Innocenti

Title: Partner & Preventive Controls Qualified Individual. Date: Dec. 22, 2024

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

Title: Preventive Controls Qualified Individual.

SUMMARY *of* REVIEW

Details *of* Product(s)	*Is foreign supplier expected to implement controls for*			**Comments**
	Biological Hazards	**Chemical Hazards**	**Physical Hazards**	
Frizzle High Heat Cooking Oil. Extra Virgin Olive Oil.	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	Verified & Approved. — See Addendum.
	☑ FSVP Importer	☑ FSVP Importer	☐ FSVP Importer	
	☐ Disclosure	☐ Disclosure	☐ Disclosure	
	☐ Customer	☐ Customer	☐ Customer	

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

REGISTER *of* SUBSTANTIATING DOCUMENTS

HAZARD ANALYSIS

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

NOTES Aceites Del Sur-Coosur, S.A., Fábrica Vilches's HACCP Plan received.

ON-SITE AUDIT REPORT

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

NOTES Aceites Del Sur-Coosur, S.A., Fábrica Vilches's BRC Audit Report received.
Dated: July, 2024.
Re-audit Due Date: Annual.
Audit Grade: A+
Number of Minor Non-conformities: 9, with corresponding corrective actions.
Previous Audit Grade: A+
Previous Audit Date: 2023.

SAMPLING OR TESTING RESULTS

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

NOTES Certificate of Analysis received from supplier.
Dated: Oct. 2024. Tested for: Pesticide residue, qualitative attributes. Laboratory: Laboratotio TELL.
Dated: 2022. Tested for: dioxin-like PCBs. Laboratory: IQS.

Graza periodically validates the efficacy of the foreign supplier's controls by directing per lot samples to be tested by an independent, third-party laboratory. Per Graza's "Testing Requirements" (see policy attached) testing must take place before oil is paid for or picked up from farm partners. Once oil is approved, oil can be transported to bottling facilities.

OTHER FOOD SAFETY RECORDS

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

NOTES Completed Foreign Supplier FSVP Questionnaire requested

Note: No substantiating information provided by the supplier.

PRODUCT LABELING

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

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

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

VERIFICATION FREQUENCY *for* UPDATED DOCUMENTS

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

FACILITY FOOD SAFETY PLAN

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

HACCP PLAN / HARPC PLAN

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

ON-SITE AUDIT RESULTS

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

LABORATORY TESTING RESULTS

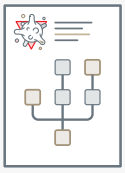
- ☑ if positive results are returned
- ☑ if recall or import refusal occurs
- ☑ if inspection occurs
- ☐ on an annual basis
- ☑ on a per-batch/shipment basis
- ☑ Chemical ☐ Biological
- ☐ *other:* _____

FDA REGISTRATION

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

FACILITY LICENSE

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



RECALL PLAN

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

PRODUCT LABEL

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

QUALIFICATIONS

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

IMPLEMENTATION RECORDS

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

FSVP QUESTIONNAIRE

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

NOTES

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

unitedsafetyagents.com/documents

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

INITIAL VERIFICATION ACTIVITIES

Summary of Actions Conducted Prior To Initial Approval

To confirm that all and any relevant or identified food safety hazards requiring a control have been significantly minimized or prevented, the below enumerated activities were used to initially verify Extra Virgin Olive Oil ("product" or "imported product"), supplied by Aceites Del Sur-Coosur, S.A., Fábrica Vilches ("supplier" or "foreign supplier"), imported by Graza ("importer" or "FSVP importer"); by United Safety Agents ("USA", "FSVP qualified individual", "qualified individual", or "QI"):

A review and assessment of Aceites Del Sur-Coosur, S.A., Fábrica Vilches's

RELEVANT FOOD SAFETY RECORDS, including a review of supplier's [1] Hazard Analysis and Critical Control Plan ("HACCP Plan"); and [2] Food Safety Plan. Per §1.506(d)(1)(ii)(C) and (e)(1)(iii), documentation of each record, including the dates of review, the general nature of the records reviewed, the conclusions of the review, and documentation that the review was conducted by a QI were completed.

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

ON-SITE AUDIT REPORT, Per §1.506(d)(2), a hazard has been identified for which there is a reasonable probability that exposure may result in serious adverse health consequences or death to humans or animals. It is the responsibility of Aceites Del Sur-Coosur, S.A., Fábrica Vilches to control the identified hazard(s). Thus, an on-site audit of the foreign supplier was acquired, assessed, and ruled acceptable prior to the product's initial import.

OTHER APPROPRIATE SUPPLIER VERIFICATION ACTIVITIES, including a review of the supplier's [1] implementation records; [2] internal monitoring procedures; and [3] compliance history – including whether the foreign supplier is or was the subject of FDA Warning Letters; Import Alerts; or other FDA compliance actions related to food safety. Per §1.506(d)(1)(ii)(D) and (e)(1)(iv)(B), documentation of each activity conducted in accordance with paragraph (e)(1)(iv), including a description of the activity, the date on which it was conducted, the findings or results of the activity, any corrective actions taken in response to significant deficiencies identified, and documentation that the activity was conducted by a QI were completed.

NOTE

Per §1.506(d)(3), FSVP importer relied on the determination of appropriate foreign supplier verification activities made by an entity other than the foreign supplier and has reviewed and assessed whether the determination was appropriate. The Importer has documented its review and assessment, including documenting that the determination of appropriate verification activities was made by a FSVP QI. The FSVP importer's attestation of review and assessment can be found on page number nine (9) of this FSVP. USA's certifications and qualifications can be found on page numbers twenty-eight (28) through thirty-six (36) of this FSVP.

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ONGOING VERIFICATION ACTIVITIES

Summary of Ongoing Verification Activities Necessary To Maintain Approval

To confirm that all and any relevant or identified food safety hazards requiring a control, for Extra Virgin Olive Oil, supplied by Aceites Del Sur-Coosur, S.A., Fábrica Vilches, continue to be significantly minimized or prevented, up-to-date versions of all documents used during the initial FSVP verification and approval processes will be re-acquired at least once every three years – or sooner, per the following document and verification activity-specific requirements:

PRIOR TO EACH ENTRY OF PRODUCT INTO THE U.S.

Batch-specific LABORATORY TESTING RESULTS demonstrating that the incoming product is absent of (or within acceptable levels of) all biological and/or chemical hazards, will be requested from supplier by the importer. If results exceed established tolerances, the product will be rejected prior to entering into the United States by importer, or delayed from distribution to the public until corrective actions have been performed and their efficacy verified. The supplier has been informed of this ongoing requirement.

ANNUALLY OR UPON CHANGE

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

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

An updated version of supplier's ON-SITE AUDIT REPORT will be requested on an annual basis. The supplier has been informed of this ongoing request and USA will acquire and review the updated Report from the supplier annually, or sooner if a change has been made.

Updated LABORATORY TESTING RESULTS will be required if a positive result is returned, recall or Import Refusal occurs, facility inspection takes place, or – at minimum – on an annual basis. The supplier has been informed of this ongoing requirement and USA will acquire the results from the supplier annually.

Confirmation that supplier's FOOD FACILITY REGISTRATION remains active with FDA will be made annually by USA.

The supplier's REGULATORY COMPLIANCE STANDING will be checked by USA via FDA's Data Dashboard annually – at a minimum – or sooner if USA is made aware of new information.

An updated version of the product's LABELING will be required if any change or update occurs. the supplier has been informed of this ongoing requirement and USA will confirm annually that the label on file remains current. Important Note: USA's assessment of the product's labeling is restricted to the label's allergen disclosure statement and should not be interpreted to mean that the label meets all requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act), the Food Allergen Labeling and Consumer Protection Act (FALCPA), or all other applicable sections of 21 CFR Part 101. It shall remain the FSVP importer's responsibility to independently confirm that the product label follows all regulations prior to import.

FREQUENCY *of* VERIFICATION ACTIVITIES

All Ongoing Verification Activities will be conducted and re-conducted at their individually noted frequency, as appropriate, to confirm that each hazard requiring a control continues to be significantly minimized or prevented by the supplier. Or, if not controlled by the supplier, is properly disclosed to the appropriate party. Document frequency-specific determinations can be found on page number twelve [12] of FSVP.

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

FDA COMPLIANCE ACTIONS & REGULATORY HISTORY

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

RESULTS *of* EVALUATION

Date *of* Action	Description *of* Action
2016	FDA FACILITY INSPECTION Inspection Id: 969018 Project Area: Foodborne Biological Hazards. etc. Classification: NAI. FDA Data Dashboard search results indicate that supplier's compliance history does not include FDA Warning Letters, Import Alerts, or other applicable compliance actions.

Covers: Aceites Del Sur-Coosur, S.A., Fábrica Vilches FEI: 3010677724 Date: Dec. 22, 2024

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

REVISION LOG *for* FSVP PLAN

Version No.	Date *of* Change	Description *of* Revision
No. 01	Dec. 22, 2024	Product and supplier underwent initial FSVP verification.

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ANALYSIS & DETERMINATION *of* BIOLOGICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Bacillus cereus*** ☐ ***Clostridium botulinum*** ☐ ***C. perfringens*** ☐ ***Brucella spp.*** ☐ ***Campylobacter spp.*** ☐ ***Pathogenic E. coli*** ☐ ***Salmonella spp.*** ☐ ***S. aureus*** ☐ ***L. monocytogenes*** ☐ ***Trichinella spiralis*** ☐ ***Giardia lamblia*** ☐ ***Shigella spp.*** ☐ ***Other***	-	-	Biological hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the application of a heat and/or chemical kill-step, implementing and following raw material supplier approval procedures, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. The FDA does not recognize any biological hazards in reference to this product type. Appendix 1 (Hazards Tables) Category: Oil Products. Subcategory: Cooking Oils. 02. All staff undergoes formal food hygiene training. 03. All staff issued protective clothing. 04. All production operatives are required to cover head/facial hair within the processing/manufacturing area. 05. Adequate toilet and hand washing facilities provided. 06. Product is positively released.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified biological hazards. ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Oil Products. Category No.: 1 Subcategory: Cooking Oils

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ANALYSIS & DETERMINATION *of* CHEMICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Drug residues*** ☐ ***Heavy metals*** ☐ ***Industrial chemicals*** ☒ ***Pesticides*** ☒ ***Mycotoxins/Toxins*** ☐ ***Radiological*** ☐ ***Unapproved colors & additives*** ☐ ***Chemical hazards due to mis-formulation*** ☐ ***Other***	1	2	Chemical hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – implementing and following appropriate raw material supplier approval procedures, and/or subjecting raw material(s) and/or finished product(s) to laboratory testing. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes raw material inspection and approval procedures to control for hazards posed by chemical agents prior to production. 02. Supplier utilizes laboratory testing to verify that product is free from chemical hazards prior to release. Details: Supplier submits finished product to laboratory for analysis. See provided CoA. Dated: Oct. 2024. Tested for: Pesticide residue, qualitative attributes. Laboratory: Laboratotio TELL. ———————NOTE——————— The formation of natural toxins, such as mycotoxins on olives is unlikely when compared to other raw materials used to create cooking oils. FDA's hazard identification category includes cooking oils made from material such as soy and corn – which pose a higher risk of toxin formation. FSVP Importer conducts independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified chemical hazards.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified chemical hazards. Graza periodically validates the efficacy of the foreign supplier's controls by directing per lot samples to be tested by an independent, third-party laboratory. Per Graza's "Testing Requirements" (see policy attached) testing must take place before oil is paid for or picked up from farm partners. Once oil is approved, oil can be transported to bottling facilities. ——————————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Oil Products. Category No.: 1 Subcategory: Cooking Oils ——————————— ———————————

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ANALYSIS & DETERMINATION *of* ALLERGENIC HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Undeclared allergens - Incorrect label*** ☐ ***Undeclared allergens - Cross-contact*** **ALLERGENS** ☐ ***Milk*** ☐ ***Eggs*** ☐ ***Fish*** ☐ ***Shellfish*** *(Crustacean)* ☐ ***Tree nuts*** ☐ ***Peanuts*** ☐ ***Wheat*** ☐ ***Soybeans*** ☐ ***Sesame***†	3	3	Allergens themselves can not be directly controlled. However, the presence of allergens – or a given allergen – can be controlled. The presence of allergenic hazards can be effectively controlled through the utilization of a number of control measures, including – but not limited to – staff training for common food allergens, avoiding cross-contact, and proper food labeling. These may be effective methods to ensure that allergens are not ingested by a person who will be experience a negative reaction. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier certifies that: A) allergens are handled on site. Fish, Sesame, Nuts, Sulphur dioxide and Sulphites, and Almond. B) a documented allergen control program is in use. C) a dedicated process line and a documented cleaning procedure are in place to prevent contamination. D) all employees undergo allergen training and processes have been put in place to reduce the likelihood of cross contact or unintentional introduction of allergens into processing area. ———————NOTE——————— ---------- Labeling Requirements ---------- - Food Allergen Labeling and Consumer Protection Act - ---------- - Nutritional information (not appliance to bulk). - Name and place of business of the manufacturer, packer, or distributor (21 CFR 101.5). - Quantity of contents (21 CFR 101.7). - Statement of identity (21 CFR 101.3). - Presence of artificial flavoring, artificial coloring, or chemical preservative (21 CFR 101.22). - Ingredient statement if the product has two or more ingredients (21 CFR 101.4). - Presence of major food allergens (21 U.S.C. 343(w)). - Percent juice (21 CFR 101.30), when applicable.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control the hazard posed by allergenic adulteration. ——————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Oil Products. Category No.: 1 Subcategory: Cooking Oils ——————— ———————

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ANALYSIS & DETERMINATION *of* ENVIRONMENTAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Recontamination with environmental pathogens.*** ☐ ***Bacterial pathogen survival of a lethal treatment.*** ☐ ***Bacterial growth and/or toxin formation due to lack of time / temperature control.*** ☐ ***Recontamination due to lack of container integrity.*** ☐ ***Bacterial growth and/or toxin formation due to poor formulation control.*** ☐ ***Bacterial growth and/or toxin formation due to reduced oxygen packaging.*** ☐ ***Other***	-	-	Hazards posed by ineffective processes or environmental pathways can be controlled by the utilization of Current Good Manufacturing Practices, positively releasing finished product, avoiding cross-contamination, carefully monitoring production process, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. The FDA does not recognize any environmental hazards in reference to this product type. Appendix 1 (Hazards Tables) Category: Oil Products. Subcategory: Cooking Oils. 02. Supplier has implemented a cleaning program and environmental monitoring for microbiological and biological hazards. 03. All product is positively released and hermetically sealed within plastic.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified environmental hazards. ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Oil Products. Category No.: 1 Subcategory: Cooking Oils

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ANALYSIS & DETERMINATION *of* PHYSICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Metal*** ☒ ***Glass*** ☐ ***Extraneous Matter*** ☐ ***Plastics*** ☐ ***Stones*** ☐ ***Wood*** ☐ ***Natural Component of Food*** ☐ ***Other***	1	2	Physical hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the utilization of an operational and calibrated metal detector during and/or after the production process, sieving raw material and/or finished product, optical sorting machinery, visual inspection, appropriate and consistent raw material supplier approval methods, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes a Glass and Breakable Plastic Program. CCP. P ≥ 1.5 bar and ≥ 3 bar Monitoring: measuring carried out every half an hour. Measure carried out by verifiers. Procedure registered in the Control Record for Quality during Processing. Validation of the CCP by tests carried out in PET and glass format; all the formats were included, ratifying that the range set for the correct. The company states that it has not had any complaints about pieces of glass in the product. 02. Supplier sieves incoming ingredients. 03. All product flows through a screen-strainer and a filter. Note: No substantiation provided.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control physical hazards. ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Oil Products. Category No.: 1 Subcategory: Cooking Oils

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ASSESSMENT *of* FOREIGN SUPPLIER

1.0 FOREIGN SUPPLIER INFORMATION

1.1. Supplier name: Aceites Del Sur-Coosur, S.A., Fábrica Vilches 1.2. Supplier country: Spain

1.3. Products manufactured/supplied: Frizzle Cooking Oil

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

Standard: BRCS Global Standard Food Safety Issue 9

2.0 SUPPLIER PROCEDURES, PROCESSES & PRACTICES

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

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

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

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

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

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

3.0 SUPPLIER PERFORMANCE HISTORY

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

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

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

☑ Yes ☐ No *Description:*

4.0 SUPPLIER APPROVAL

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

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

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

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

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Claims Made Against Product

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

Overview *of* Foreign Supplier's Commercial Operation

The refining and packing of edible vegetable oils in pet, glass, spray, tin, bulk and flexitank formats. The production and packing of nutritional oils in PET and glass formats. IncludES outsourced packing of oil in PET tubs

Testing Program & Accreditation

The factory laboratory carries out specific analytical controls on raw materials, being dedicated to the control of changes in the factory and mixtures of oils in the factory. Graza relies on the foreign supplier to control all identified biological, chemical, and physical hazards prior to U.S. entry. Graza periodically validates the efficacy of the foreign supplier's controls by directing per lot samples to be tested by an independent, third-party laboratory. Per Graza's "Testing Requirements" (see policy attached) testing must take place before oil is paid for or picked up from farm partners. Once oil is approved, oil can be transported to bottling facilities.

Supplier & Product Allergen Information

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

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

Packaging Type & Shipping / Handling Requirements

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Supplier GFSI Status & Historical Performance

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

Close Supplier Monitoring

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

General Comments & Verification Timeline

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

NOTE

Coppies of Graza periodic testing results to validate natural toxins and pesticides.

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ADDENDUM

NOTE

Labeling Requirements

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

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

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

Food Allergen Labeling and Consumer Protection Act

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

ADDENDUM

INTENTIONALLY

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Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches

Product: Frizzle Cooking Oil

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

Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

Claudio Innocenti

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

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on
05/13/2021

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

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Certificate # 31d8ad94

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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

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ILLINOIS INSTITUTE OF TECHNOLOGY

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AAFCO
Association of American Feed Control Officials

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Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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delivered by Lead Instructor

Bob Bauer

completed on

09/14/2018

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

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Certificate # d2e9c287

Produce Safety
ALLIANCE

AFDO
ASSOCIATION OF FOOD & DRUG OFFICIALS
SINCE 1896

Certificate of Training

is awarded to

Claudio Innocent

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

PSA Grower Training Course

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

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

Joseph Corby
Executive Director, AFDO

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on

05/31/2018

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

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delivered by Lead Instructor

Bob Bauer

completed on

09/14/2017

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

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International Food Protection Training Institute

Joseph Corby, Executive Director
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Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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CLAUDIO INNOCENTI

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

FSPCA PREVENTIVE CONTROLS FOR HUMAN FOOD

delivered by Lead Instructor

Amanda Evans

completed on

07/25/2017

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

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AFDO

Certificate # 2d697331

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

QUALIFICATIONS *of* SUPPORTING QI

FSPCA
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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

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is awarded to

William Barber

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the Food Safety Preventive Controls Alliance course:

Foreign Supplier Verification Programs

delivered by Lead Instructor

tina coil

completed on
06/13/2017

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

Certificate # 917b0241

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Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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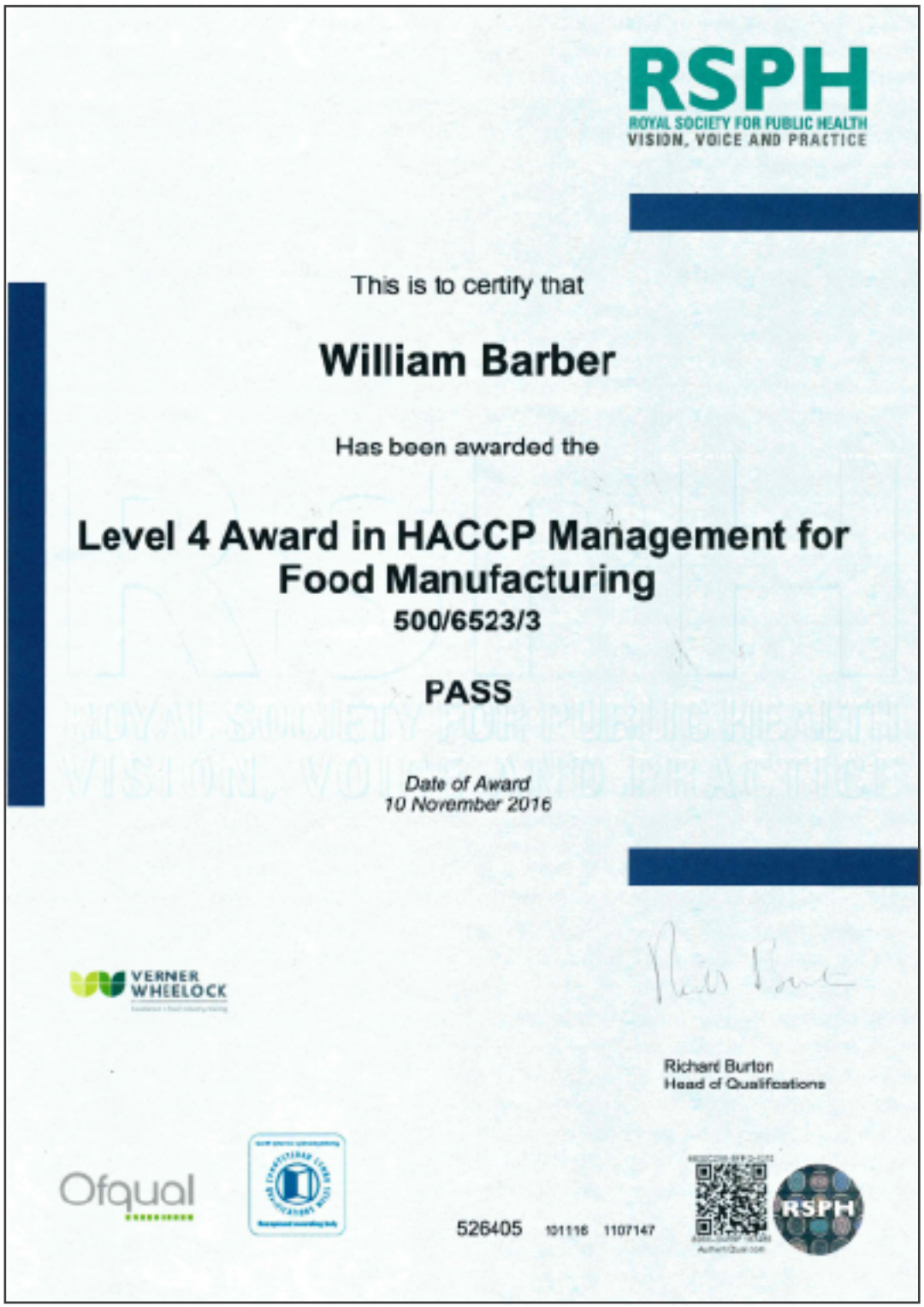

RSPH
ROYAL SOCIETY FOR PUBLIC HEALTH
VISION, VOICE AND PRACTICE

This is to certify that

William Barber

Has been awarded the

Level 4 Award in HACCP Management for Food Manufacturing

500/6523/3

PASS

Date of Award
10 November 2016

VERNER WHEELOCK

Richard Burton
Head of Qualifications

Ofqual

526405 101116 1107147

RSPH

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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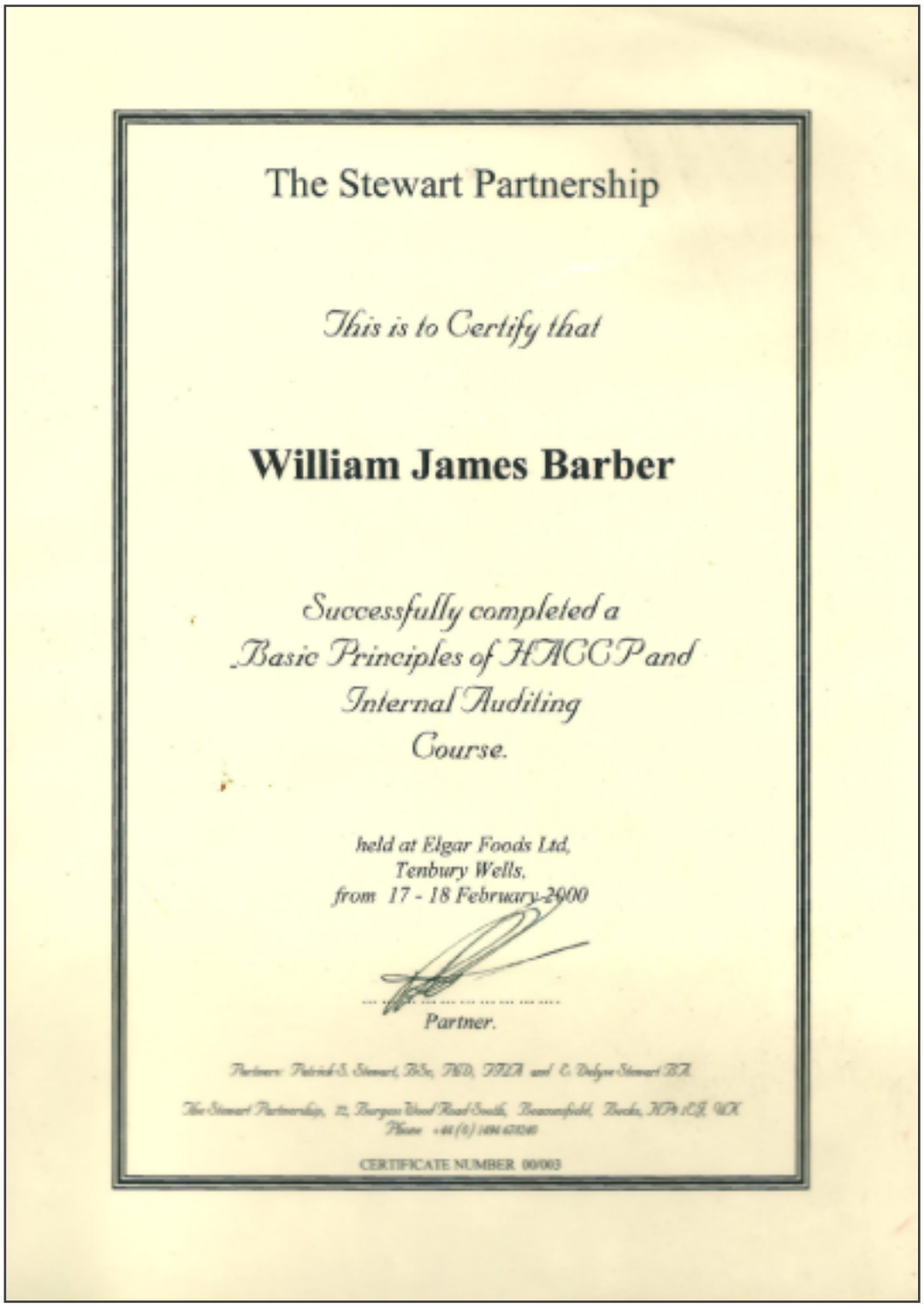

The Stewart Partnership

This is to Certify that

William James Barber

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

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

Partner.

Partners: Patrick S. Stewart, BSc, PhD, FIFST and C. Dalyn Stewart BA

The Stewart Partnership, 12, Burgess Wood Road South, Beaconsfield, Bucks, HP9 1EJ, UK
Phone +44 (0) 1494 671241

CERTIFICATE NUMBER 00/003

QUALIFICATIONS *of* SUPPORTING QI

City & Guilds

NATIONAL VOCATIONAL QUALIFICATION

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

IS AWARDED TO
WILLIAM BARBER

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

AWARDED SEPTEMBER 2007 0739/0249/07A/124203/PXC4025/1/13/03/64

M Howell
Chairman
The City and Guilds of London Institute

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

QCA
Qualifications and Curriculum Authority

QUALIFICATIONS *of* SUPPORTING QI

City & Guilds

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

IS AWARDED TO
WILLIAM BARBER

WHO ATTENDED PERSHORE GROUP OF COLLEGES

AND WAS SUCCESSFUL IN THE
FOLLOWING TEN UNITS

CONTROL AND MAINTAIN QUALITY WITHIN MULTI-STAGE MANUFACTURING OPERATIONS	U1024734
RESOLVE PROBLEMS IN MULTI-STAGE MANUFACTURING OPERATIONS	U1024735
MAINTAIN AND IMPROVE HEALTH AND SAFETY WITHIN THE WORKPLACE	U1024736
MAINTAIN AND IMPROVE HYGIENE AND PRODUCT SAFETY WITHIN THE WORKPLACE	U1024737
CONTRIBUTE TO THE ACHIEVEMENT OF ORGANISATIONAL AND PERSONAL GOALS	U1028661
PROVIDE INFORMATION TO SUPPORT DECISION MAKING	U1026164
MONITOR AND MAINTAIN THE HANDLING AND STORAGE OF MATERIALS	U1024742
IMPLEMENT QUALITY ASSURANCE SYSTEMS	U1027820
DEVELOP A FOOD AND DRINK PRODUCT	U1050074

CONTINUED

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

M Howell
Chairman
The City and Guilds of London Institute

C Humphries
Director General
The City and Guilds of London Institute

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

Supplier: Aceites Del Sur-Coosur, S.A., Fábrica Vilches Product: Frizzle Cooking Oil

Agent(s): Claudio Innocenti (PCQI. Member, USA) Review Start: Nov. 24, 2024 Review End: Dec. 22, 2024

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' PCQI*(s)*.

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

Plan de acción

Empresa ACEITES DEL SUR - COOSUR. CTRA. DE LA CAROLINA Km 29. 23220. VILCHES (JAEN). España
COID 6984
Número de cliente 7497/0910/IFS/01
Norma IFS/Programa/Check IFS Food 8
Tipo de evaluación/auditoría Auditoría de recertificación
Fecha de inicio de la auditoría/evaluación 15/07/2024

Por favor, no cambie el título de la tabla ni el texto del título.

Requirement Text		Requirement Explanation		Correction Responsibility	Correction Due Date	Correction Status	Correction Evidence	Corrective Action Description					
Número	Requisito de IFS Food 8	Evaluación	Explicación (del auditor/asesor)	Corrección (por parte de la Empresa)	Responsabilidad (por parte de la Empresa)	Fecha (por parte de la Empresa)	Estado de implementación (por la empresa)	Tipo de evidencias y nombre del documento(s)	Acción correctiva (por parte de la Empresa)	Responsabilidad	Fecha (por	Estado de	Aprobación	Fecha de
1.1.1	La dirección deberá desarrollar, implementar y mantener una política corporativa, que deberá incluir, como mínimo: • seguridad alimentaria, calidad del producto, legalidad y autenticidad • orientación al cliente • cultura de seguridad alimentaria. • sostenibilidad. La política corporativa deberá ser comunicada a todos los empleados y se desglosará en objetivos específicos para los departamentos correspondientes. Los objetivos sobre la cultura de seguridad alimentaria incluirán, como mínimo, la comunicación sobre las políticas de seguridad alimentaria y responsabilidades, formación, la retroalimentación de los empleados sobre cuestiones relacionadas con la seguridad alimentaria y la medición del rendimiento.	C	The performance measurements of the plan's activities are not considered entirely adequate since non-cultural parameters are used for it (for example, PRL). On the other hand, in terms of employees' knowledge of the food safety culture plan, it is considered deficient during the interviews held with the mimes (misconceptions or lack of knowledge of the plan) Las mediciones del rendimiento de las actividades del plan, no se consideran del todo adecuadas ya que para el mismo se utilizan parámetros no relacionados con la cultura (por ejemplo PRL). Por otra parte, en cuanto al conocimiento del plan de cultura de seguridad alimentaria por parte de los empleados, se considera deficiente durante las entrevistas mantenidas con los mimos (conceptos erróneos o desconocimiento del plan)	Se separan los ítems del checklist general para obtener valores que solo impliquen los aspectos relacionados con la cultura de seguridad alimentaria (GMP). The items of the general checklist are separated in order to obtain values that only involve the aspects related to the food safety culture (GMP).	Ana María Álvarez (Quality responsible)	7/22/24	100%	Evidencia: NC brc 1.1.2 recorte de la app donde aparecen los items separados. Evidence: NC brc 1.1.2 cut-out of the app where the items are separated.	Causa: En el checklist que disponia la app de BKG se valoraban items de distinta naturaleza (PRL, medio ambiente, calidad, GMP, etc). Cause: In the checklist provided by the BKG app, items of different nature (PRL, environment, quality, GMP, etc.) were assessed. Se separan los ítems del checklist general para obtener valores que solo impliquen los aspectos relacionados con la cultura de seguridad alimentaria (GMP). Evidencia: NC brc 1.1.2 recorte de la app donde aparecen los items separados. The items of the general checklist are separated in order to obtain values that only involve the aspects related to the food safety culture (GMP). Evidence: NC brc 1.1.2 cut-out of the app where the items are separated	Ana María Álvarez (Quality responsible)	7/22/24	100%		
3.4.6	Las instalaciones de lavado de manos estarán equipadas con: • agua potable a una temperatura adecuada • equipo adecuado para el lavado y desinfección • equipo adecuado para el secado de las manos.	C	En la visita a las instalaciones se detecta un punto de lavado de manos en donde Falta papel de secado (vestuarios) During the visit to the facilities, a hand washing point is detected where drying paper (changing rooms) is missing	Se coloca un rollo de papel. A roll of paper is placed.	Ana María Álvarez (Quality responsible)	7/30/24	100%	Evidencia: NC brc 4.8.4 rollo del papel antes y después y con el cartel identificativo. Evidence: NC brc 4.8.4 paper roll before and after and with the identification sign.	Causa: El papel se acabó y nadie notificó su necesidad de reponerlo. cause: The paper ran out and no one notified their need to replace it. Se coloca carteles informativos para que se avise a la persona responsable de reponerlos. Evidencia: foto del cartel (nc brc 4.8.4) Information signs are placed so that the person responsible for replacing them is notified. Evidence: photo of the poster (nc brc 4.8.4)	Ana María Álvarez (Quality responsible)	7/30/24	100%		
4.9.6.2	Se construirán puertas y accesos exteriores de forma que se impida el acceso de plagas.	C	Durante la visita al almacén materiales auxiliares, se detecta que la puerta de acceso trasera no cierra herméticamente During the visit to the auxiliary materials warehouse, it is detected that the rear access door does not close hermetically	Se incorpora el muelle para su cierre automático. The spring is incorporated for automatic closing.	Ana María Álvarez (Quality responsible)	7/31/24	100%	Evidencia: NC brc 4.4.8 puerta antes y después de la colocación del muelle. Evidence: NC brc 4.4.8 door before and after placement of the spring.	Causa:Tras la finalización de la instalación de dicha puerta no se determinó que era necesario el muelle para su cierre automático. cause: After the completion of the installation of said door, it was not determined that the spring was necessary for its automatic closing. Se modifica el procedimiento de mantenimiento para determinar si necesario incorporar el cierre automático. Evidencia: PC_1001_57 páginas del procedimiento modificado (páginas 2 y 5) The maintenance procedure is modified to determine if it is necessary to incorporate automatic closure. Evidence: PC_1001_57 pages of the modified procedure (pages 2 and 5)	Ana María Álvarez (Quality responsible)	8/5/24	100%		
4.10.2	Se implementarán actividades de limpieza y desinfección que darán lugar a una limpieza efectiva de las instalaciones y los equipos.	D	En la visita a las instalaciones se detecta falta de limpieza en: a)parte superior de los depósitos b)aseos de vestuarios masculinos On the visit to the facilities, a lack of cleanliness is detected in: a) Upper part of the tanks b) Toilets in men's changing rooms	a)ver no conformidad 5.11.4 b)Se limpia la parte superior de los aseos. a) see non-conformity 5.11.4 b) The upper part of the toilets is cleaned.	Ana María Álvarez (Quality responsible)	7/31/24	100%	Evidencia: NC brc 4.11.1 parte superio de las taquillas antes y despues de la limpieza y recorte del registro de limpieza con el aumento de la frecuencia de la limpieza. Evidence: NC brc 4.11.1 top of lockers before and after cleaning and cutting of the cleaning record with increasing cleaning frequency.	causa: a) ver NC 5.11.4 b) La frecuencia de la limpieza de la parte superior de las taquillas es insuficiente. cause: a) see NC 5.11.4 b) The frequency of cleaning the upper part of the lockers is insufficient a)Ver no conformidad 5.11.4 b)Se comunica a Eulen que aumente la frecuencia de la limpieza de dicha zona a quincenal. Evidencia: Recorte del registro de limpieza con la frecuencia modificada. (nc brc 4.11.1) a) See non-conformity 5.11.4 b) Eulen is informed to increase the frequency of cleaning said area to biweekly. Evidence: Clipping of the cleaning log with the modified frequency. (nc brc 4.11.1)	Ana María Álvarez (Quality responsible)	8/1/24	100%		
4.10.7	Se verificará la eficacia de las medidas de limpieza y desinfección. La verificación se basará en un programa de muestreo basado en el riesgo y considerará una o varias acciones, por ejemplo: • inspección visual • muestreo rápido • métodos de control analítico. Las acciones resultantes deberán ser documentadas.	D	El actual procedimiento de verificación de la limpieza no garantiza que se alcancen los niveles adecuados de la misma, por ejemplo se detecta pequeños fragmentos de vidrio en el suelo de la línea 8 después de que el producto este cerrado The current cleanliness verification procedure does not guarantee that adequate levels of cleanliness are achieved, for example small fragments of glass are detected on the floor of line 8 after the product is closed	Se limpia la zona The área is cleaned	Ana María Álvarez (Quality responsible)	8/3/24	100%	Evidencia: registro de verificación R_PC_1001_48_01 Evidence: verificaticon record R_PC_1001_48_01	Causa: No se habia tenido en cuenta la posibilidad de desprendimiento de fragmentos de vidrio posteriores a la puesta en marcha de la maquina Cause: No allowance was made for the possibility of glass fragments becoming detached after the machine had been put into operation. Se modifica el procedimiento PC_1001_48 Actuación ante roturas de vidrio en linea Evidencia: procedimiento modificado (PC_1001_48 Actuación ante roturas de vidrio en línea páginas 2 y 6) Procedure PC_1001_48 Action in the event of glass breakage on the line is modified. Evidence: modified procedure (PC_1001_48, pages 2 an 6)	Ana María Álvarez (Quality responsible)	8/9/24	100%		

4.12.9	Se documentarán, implementarán y mantendrán procedimientos que describan las medidas a tomar en caso de rotura de vidrio y/o material quebradizo. Dichas medidas deberán incluir la descripción del alcance de los productos que requieran ser aislados, la identificación del personal autorizado, la limpieza y si es necesario, la desinfección del entorno de trabajo y la autorización para reemprender la actividad en la línea de producción.	C	En relación a la gestión del vidrio se observa que las operarias de limpieza no están utilizando los útiles específicos para rotura usa rojo cuando esta definido verde In relation to glass management, it is observed that the cleaning operators are not using the specific tools for breakage, they use red when green is defined	Se les indica que deben usarse de forma correctamente según código de colores. They are instructed to use them correctly according to the colour code	Ana María Álvarez (Quality responsible)	8/7/24	100%	Evidencia: NC brc 4.9.4.2 formación al personal de limpieza. Evidence: NC brc 4.9.4.2 training for cleaning staff	Causa: Falta de formación y concienciación sobre el uso correcto de los útiles de limpieza. Cause: Lack of training and awareness of the correct use of cleaning tools Se realiza una formación personalizada con el personal de limpieza para concienciar sobre la importancia de su correcto uso. Personalised training is carried out with cleaning staff to raise awareness of the importance of their correct use.	Ana María Álvarez (Quality responsible)	8/7/24	100%		
4.13.1	La infraestructura y los equipos se diseñarán, construirán y mantendrán para evitar la infestación de plagas.	C	En la visita a las instalaciones de refinería se detecta red antipajaros descolgada During the visit to the refinery facilities, an anti-bird net is detected hanging	Se coloca la red antipájaros. The anti-bird net is placed.	Ana María Álvarez (Quality responsible) Antonio Cruz (Refinery manager)	8/8/24	100%	Evidencia: NC 4.14.7 la red antipájaros colocada Evidence: NC 4.14.7 the anti-bird net placed	causa: Las revisiones se hacían mensualmente sin tener en cuenta las infraestructuras que están en obras. Cause: Revisions were made on a monthly basis without taking into account infrastructures under construction. Indicación a la persona que los realizada para que en caso de haber obras en las infraestructuras se revise dicha zona semanalmente. Evidencia: Comunicado (comunicado nc brc 4.14.7) Indication to the person who carried them out so that if there is work on the infrastructure, said area is reviewed weekly. Evidence: Indication (realese nc brc 4.14.7)	Ana María Álvarez (Quality responsible)	8/7/24	100%		
4.18.1	KO N° 7: Se documentará, implementará y mantendrá un sistema de trazabilidad que permita la identificación de lotes de productos y su relación con lotes de materias primas, materiales de envasado en contacto con alimentos y/o materiales que contengan información legal y/o pertinente sobre seguridad alimentaria. El sistema de trazabilidad incluirá todos los registros correspondientes de: • recepción • procesando en todos los pasos • uso de reprocesos • distribución. La trazabilidad debe estar garantizada y documentada hasta la entrega al cliente.	B	Durante la evaluación, se realizó la siguiente prueba de trazabilidad iniciada por el auditor. Punctually during the visit to the facilities, a tank of 1000 liters of unidentified AO light is detected in the spray area. Puntualmente en la visita a las instalaciones se detecta en la zona de sprays un depósito de 1000 litros de AO light sin identificar.	Todos los IBC se etiquetan con el número interno que identifica el número de pedido/número de cliente. All IBCs are labeled with the internal number that identifies the order number/customer number.	Ana María Álvarez (Quality responsible)	7/16/24	100%	Evidencia: NC brc 3.9.2 IBCs antes y después de identificarlo con el número de pedido y sticker con la nueva forma de identificar los IBCs. Evidence: NC brc 3.9.2 IBCs before and after identifying them with the order number and sticker with the new way of identifying IBCs.	Causa: La información recogida en la etiqueta identificativa proporcionada por el cliente no tiene la suficiente información. Cause: The information collected on the identification label provided by the client does not have enough information. Se modifica el procedimiento de trazabilidad indicando que los bidones deben estar identificados con el número de pedido/cliente. Evidencia: PGH_1001_08 páginas del procedimiento modificado (páginas 2 y 7) The traceability procedure is modified indicating that the drums must be identified with the order/customer number. Evidence: PGH-1001-08 pages of the modified procedure (pages 2 and 7)	Ana María Álvarez (Quality responsible)	8/5/24	100%		
5.11.4	Se debe evaluar la efectividad de las correcciones y acciones correctivas implementadas y se dcocumentarán los resultados de dicha evaluación.	C	En relación a la eficacia de las acciones correctivas se detecta que la nc de la limpieza de los depósitos del año anterior se vuelve a repetir In relation to the effectiveness of the corrective actions, it is detected that the nc of the cleaning of the tanks of the previous year is repeated	Se limpia la zona superior. The upper area is cleaned.	Ana María Álvarez (Quality responsible)	06/08/204	100%	Evidencia: NC brc 1.1.12 zona superior de los depósitos antes y después de la limpieza. Evidence: NC brc 1.1.12 top area of tanks before and after cleaning.	Causa:La elevada dispersión de las tierras de filtración. Cause:The high dispersion of filtration lands. Se realiza un proyecto para incorpora un extractor para impedir la dispersión de las tierras de filtración. Evidencia: Presupuesto firmado por ambas partes. A project is being carried out to incorporate an extractor to prevent the dispersion of filtration soils. Evidence: Budget signed by both parties.	Alfonso Lopez (Industry Director)	8/8/24	25%		

Audit Report **Global Standard Food Safety Issue 9**

1. Audit Summary

Company name	ACEITES DEL SUR-COOSUR, S.A.	Site code	1495979
Site name	ACEITES DEL SUR-COOSUR, S.A. (Fábrica Vilches)		
Scope of audit	Refining, mixing, filtering and packaging (with or without modified atmosphere) of edible vegetable oils in pet, glass, drums, in bulk and flexitank. Preparation and packaging of fatty preparations in pet, glass and spray format Includes outsourced packing of oil in PET tubs. *Refinado, mezclado, filtrado y envasado (con o sin atmosfera modificada) de aceites vegetales comestibles en formato pet, vidrio, bidones, a granel y flexitank. Elaboración y envasado de preparados grasos en formato pet, vidrio y spray. Se incluye la subcontratación de envasado de aceite en tarrinas de PET.*		
Exclusions from scope	None		
Justification for exclusion	None		
Audit start date	2024-07-15	Audit finish date	2024-07-18
Re-audit due date	2025-10-28	Head office	No

Additional modules included

Modules	Result	Scope	Exclusions from Scope
Meeting FSMA requirements for Food	Passed	The refining and packing of edible vegetable oils in pet, glass, spray, tin, bulk and flexitank formats. The production and packing of nutritional oils in PET and glass formats. IncludES outsourced packing of oil in PET tubs	ninguna
Choose a module	Choose an item		

2. Audit Results

Audit result	Certificated	Audit grade	A+	Audit programme	Unannounced - Voluntary
Previous audit grade	A+		Previous audit date	2023-07-07	

2. Audit Results

Certificate issue date	2024-08-29	Certificate expiry date	2025-12-09
Number of non-conformities		Fundamental	0
		Critical	0
		Major	0
		Minor	9

3. Company Details

Site address	CTRA. LA CAROLINA, 29 23220 VILCHES (JAEN)		
Country	Spain	Site telephone number	+34 953 631 165
Commercial representative name	Mr José Manuel González	Email	jmgonzalez@acesur.com
Technical representative name	Ana María Alvarez Rodriguez	Email	amalvarez@acesur.com

4. Company Profile

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

Shift pattern	3; 6-14 h; 14-22 h; 22-6 h	
Seasonal site	No	
Seasonal opening times (Start/end date)	Click or tap to enter a date.	Click or tap to enter a date.
Other certificates held	IFS Food, ISO 9001, ISO 14001, HALAL, KOSHER, Organic, IGP Jaen, UNE 19601 and RED II Directive (EU) 2018/2001	

4. Company Profile

Outsourced processes	Yes
Outsourced process description	Packing of monodosages of olive oil
Regions exported to	Europe Asia North America South America Choose a region Choose a region
Company registration number	16.00064/J 40.22247/J;
Major changes since last BRCGS audit	MES digitalization production control manufacturing improvement (stops and problems through signals)

Company Description

The company has a workforce of around 220 employees, including permanent, temporary and temporary workers. Work is generally performed in three shifts.

55% of the oil is sold nationally and 35% is exported mainly to England, Japan, Australia, Germany... 60% of the oil is sold under retailers' private labels, the remaining 40% being marketed mainly under the COOSUR and LA ESPAÑOLA brands.

The Protocol logo is only used on the paper used in letters, communications and invoices.

The contact person for emergency situations or health alerts is the Director of Quality Francisco Alvarez 629590360

Production volume: 128,328,694 l.

ACEITES DEL SUR, S.A. ubicada en VILCHES (Jaén) es una empresa de refinado y envasado de aceites vegetales. La empresa dispone de una amplia gama de productos elaborados a partir de aceites vegetales:
- Aceite de oliva virgen extra: hasta 60 productos
- Aceite de oliva mezcla (oliva virgen + refinado): hasta 47 productos
- Aceite de orujo: hasta 6 productos
- Aceite refinado de girasol: hasta 13 productos
- Aceite de semillas: Hasta 6 productos

se incluye la subcontratación del envasado de aceite en tarrina de PET
Además trabaja en otros ámbitos del sector agroalimentario como son la comercialización de aceituna de mesa, la elaboración de salsas y condimentos, envasado y comercialización de vinagres.

La planta de Vilches dispone del siguiente número de registro sanitario: 16.000064/J con alcance a la actividad de envasado, distribución, importación y refinación de aceites de oliva y de semillas

4. Company Profile

oleaginosas. Dispone también del número 40.0022247/J de almacenamiento polivalente. FDA 18299716862.

Cuenta con unas instalaciones con una superficie construida de aproximadamente de 45.000 m2. (año 1970 con sucesivas modificaciones, Producción 5500 m2 y almacén 8.217 m2 = total de 13.717 m2) Se encuentran distribuidas en diferentes edificios: Refinería planta de envasado, almacenes de materias primas, almacenes de materiales auxiliares, almacén automático de producto terminado, almacén convencional de producto acabado y laboratorio. Los productos comercializados son almacenados en un operador logístico externo por lo que no aplica el módulo de comercialización.
La capacidad potencial de envasado es de 400.000 litros / 8 horas (las instalaciones cuentan con 7 líneas principales de envasado, así como líneas menores de envasado en grandes formatos y en sprays).

Los procesos tecnológicos presentes en la fábrica son: Filtración con carbón activo en refinería para eliminar contaminantes (HAPs) Desecado del producto en refinería. Envasado. Destilación de ácidos grasos en refinería. Refinación física de oliva y refinación química de semillas y orujo
Dispone de una plantilla de alrededor de 220 trabajadores entre fijos, fijos discontinuos y eventuales. El trabajo se realiza generalmente en tres turnos.

El 55% se vende a nivel nacional y el 35% se exporta principalmente a Inglaterra, Japón, Australia, Alemania… El 60% del aceite se vende con marca blanca de retailers, comercializándose el 40% restante con las marcas COOSUR y LA ESPAÑOLA principalmente.

Sólo se realiza uso del logotipo del Protocolo en el papel empleado en cartas, comunicaciones, facturas.

La persona de contacto para situaciones de emergencia o alerta sanitaria es el Director de Calidad Francisco Alvarez 629590360

Volumen de producción: 128.328.694 l.

5. Product Characteristics

Product categories	18 - Oils and fats Category Category Category Category Category Category Category				
Finished product safety rationale	Aw<0,6; Ambient products and long shelf life.				
High care	No	High risk	No	Ambient high care	No
Justification for area	According to decision tree for ambient products, there are not risk areas				

5. Product Characteristics

Allergens handled on site	None Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	”Girasol alto oleico”, Organic
Product recalls in last 12 months	No
Products in production at the time of the audit	1º dia GIRASOOL TRADICIONAL 3X5 L PET, O.LIGHT (L5) ESPAÑOLA 6X1 L MBR COLES AUSTR, (L8). O. 0.4 º NATUREL 8X2 L PET SINGAPUR (L7). 2º día OLIVA ESP BARBACOA 8 x200 SPRAY (l10). O.SUAVE DIA 15X1 L PET. (L6) AOVEX GREAT VALUE 12X500 PET BER USA (L4)

6. Audit Duration Details

Total audit duration	30 man hours	Duration of production facility inspection	15 man hours
Reasons for deviation from typical or expected audit duration	Total audit duration 32 hours due to be combined GFSI squeme, FSMA module		
Combined audits	IFS		
Next audit type selected	Unannounced - Voluntary		

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
Francisco Álvarez Andújar	Quality director	X	X	X	X
Jose Manuel Gonzalez	Compliance		X	X	X
Ana María Álvarez	Quality manager of Site	X	X	X	X
Lola Saeta	Tecnico gestion de Calidad	X	X	X	X
Juan Melchor	Maintenance technician		X	X	
Jesús Vizcaino	Line manager		X		
Lola Molina	Verifier of quality		X	X	
Agustina Barneo	Responsible Laboratory		X	X	
Ana Márquez	Responsible contaminants			X	
Luis Salazar	Responsible Physic-Chemical oil			X	
Antonio Quesada	Shift manager refining		X		
Rafael Quesada	Shift manager refining		X		
Juan Antonio Lopez	Operador de refinería		X		
Santiago Martínes	Etiquetas		X		
Rosa María Mota	Personal limpieza		X		
DDaniel Gil	Line manager		X		
Jose Antonio Ciudad Real	Line manager		X		

Miriam Fernandez	Line manager		X		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2022-07-08	BRCGS	Unannounced	Pass

Document control			
CB Report number	Click or tap here to enter text.		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	*Template issue date*	2022-12-16
Directory allocation	Food	*Version*	1.1

Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.2	Las mediciones del rendimiento de las actividades del plan, no se consideran del todo adecuadas ya que para el mismo se utilizan parámetros no relacionados con la cultura (por ejemplo PRL). Por otra parte, en cuanto al conocimiento del plan de cultura de seguridad alimentaria por parte de los empleados, se considera deficiente durante las entrevistas mantenidas con los mimos (conceptos erróneos o desconocimiento del plan) The performance measurements of the plan's activities are not considered entirely adequate since parameters not related to culture (for example PRL) are used. On the other hand, regarding the knowledge of the food safety culture plan by employees, it is considered deficient during the interviews held with them (misconceptions	Se separan los ítems del checklist general para obtener valores que solo impliquen los aspectos relacionados con la cultura de seguridad alimentaria (GMP). Evidencia: NC brc 1.1.2 recorte de la app donde aparecen los items separados. The items of the general checklist are separated in order to obtain values that only involve the aspects related to the food safety culture (GMP). Evidence: NC brc 1.1.2 cut-out of the app where the items are separated.	Se separan los ítems del checklist general para obtener valores que solo impliquen los aspectos relacionados con la cultura de seguridad alimentaria (GMP). Evidencia: NC brc 1.1.2 recorte de la app donde aparecen los items separados. The items of the general checklist are separated in order to obtain values that only involve the aspects related to the food safety culture (GMP). Evidence: NC brc 1.1.2 cut-out of the app where the items are separated.	En el checklist que disponía la app de BKG se valoraban ítems de distinta naturaleza (PRL, medio ambiente, calidad, GMP, etc). In the checklist provided by the BKG app, items of different nature (PRL, environment, quality, GMP, etc.) were assessed.	11-08-2024	Jose Emilio Pertierra

Minor						
	or lack of knowledge of the plan).					
1.1.12	En relación a la eficacia de las acciones correctivas se detecta que las nc 4.11.1 In relation to the effectiveness of the corrective actions, it is detected that the nc 4.11.1	Se limpia la zona superior. Evidencia: NC brc 1.1.12 zona superior de los depósitos antes y después de la limpieza. The upper area is cleaned. Evidence: NC brc 1.1.12 top area of tanks before and after cleaning.	Se realiza un proyecto para incorpora un extractor para impedir la dispersión de las tierras de filtración. Evidencia: Presupuesto firmado por ambas partes. A project is being carried out to incorporate an extractor to prevent the dispersion of filtration soils. Evidence: Budget signed by both parties.	La elevada dispersión de las tierras de filtración. The high dispersion of filtration lands.	11-08-2024	Jose Emilio Pertierra

3.9.2	Puntualmente en la visita a las instalaciones se detecta en la zona de sprays un depósito de 1000 litros de AO light sin identificar. Specifically, during the visit to the facilities, an unidentified tank of 1000 liters of AO light was detected in the spray area.	Todos los IBC se etiquetan con el número interno que identifica el número de pedido/número de cliente. Evidencia: NC brc 3.9.2 IBCs antes y después de identificarlo con el número de pedido y sticker con la nueva forma de identificar los IBCs. All IBCs are labeled with the internal number that identifies the order number/customer number. Evidence: NC brc 3.9.2 IBCs before and after identifying them with the order number and sticker with the new way of identifying IBCs.	Se modifica el procedimiento de trazabilidad indicando que los bidones deben estar identificados con el número de pedido/cliente. Evidencia: PGH_1001_08 páginas del procedimiento modificado (páginas 2 y 7) The traceability procedure is modified indicating that the drums must be identified with the order/customer number. Evidence: PGH-1001-08 pages of the modified procedure (pages 2 and 7)	La información recogida en la etiqueta identificativa proporcionada por el cliente no tiene la suficiente información. The information collected on the identification label provided by the client does not have enough information.	11-08-2024	Jose Emilio Pertierra
4.4.8	Durante la visita al almacén materiales auxiliares, se detecta que la puerta de acceso trasera no cierra herméticamente	Se incorpora el muelle para su cierre automático. Evidencia: NC brc 4.4.8 puerta antes y después de la colocación del muelle.	Se modifica el procedimiento de mantenimiento para determinar si necesario incorporar el cierre automático.	Tras la finalización de la instalación de dicha puerta no se determinó que era necesario el muelle para su cierre automático.	11-08-2024	Jose Emilio Pertierra

	During the visit to the auxiliary materials warehouse, it is detected that the rear access door does not close tightly	The spring is incorporated for automatic closing. Evidence: NC brc 4.4.8 door before and after placement of the spring.	Evidencia: PC_1001_57 páginas del procedimiento modificado (páginas 2 y 5) The maintenance procedure is modified to determine if it is necessary to incorporate automatic closure. Evidence: PC_1001_57 pages of the modified procedure (pages 2 and 5)	After the completion of the installation of said door, it was not determined that the spring was necessary for its automatic closing.		
4.8.4	En la visita a las instalaciones se detecta un punto de lavado de manos en donde Falta papel de secado (vestuarios) During the visit to the facilities, a hand washing point was detected where there was a lack of drying paper (changing rooms).	Se coloca un rollo de papel. Evidencia: NC brc 4.8.4 rollo del papel antes y después y con el cartel identificativo. A roll of paper is placed. Evidence: NC brc 4.8.4 paper roll before and after and with the identification sign.	Se coloca carteles informativos para que se avise a la persona responsable de reponerlos. Evidencia: foto del cartel (nc brc 4.8.4) Information signs are placed so that the person responsible for replacing them is notified.	El papel se acabó y nadie notificó su necesidad de reponerlo. The paper ran out and no one notified their need to replace it.	11-08-2024	Jose Emilio Pertierra

			Evidence: photo of the poster (nc brc 4.8.4)			
4.9.4.2	En relación a la gestión del vidrio se observa que las operarias de limpieza no están utilizando los útiles específicos para rotura usa rojo cuando esta definido verde In relation to glass management, it is observed that the cleaning workers are not using the specific tools for breaking, they use red when green is defined.	Se les indica que deben usarse de forma correctamente según código de colores. Evidencia: NC brc 4.9.4.2 formación al personal de limpieza. They are instructed to use them correctly according to the colour code Evidence: NC brc 4.9.4.2 training for cleaning staff	Se realiza una formación personalizada con el personal de limpieza para concienciar sobre la importancia de su correcto uso. Personalised training is carried out with cleaning staff to raise awareness of the importance of their correct use.	Falta de formación y concienciación sobre el uso correcto de los útiles de limpieza. Lack of training and awareness of the correct use of cleaning tools.	11-08-2024	Jose Emilio Pertierra
4.11.1	En la visita a las instalaciones se detecta falta de limpieza en: parte superior de los depósitos	a) ver no conformidad 1.1.12 b) Se limpia la parte superior de los aseos. Evidencia: NC 4.11.1 parte superio	a) Ver no conformidad 1.1.12 b) Se comunica a Eulen que aumente la frecuencia de la	a) ver NC 1.1.12 b) La frecuencia de la limpieza de la parte superior de las taquillas es insuficiente. a) see NC 1.1.12 b) The frequency of cleaning the upper part of the lockers is insufficient.	11-08-2024	Jose Emilio Pertierra

	aseos de vestuarios masculinos During the visit to the facilities, a lack of cleaning was detected in: a) top of the tanks b) men's locker room toilets	de las taquillas antes y despues de la limpieza y recorte del registro de limpieza con el aumento de la frecuencia de la limpieza. a) see non-conformity 1.1.12 b) The upper part of the toilets is cleaned. Evidence: NC brc 4.11.1 top of lockers before and after cleaning and cutting of the cleaning record with increasing cleaning frequency.	limpieza de dicha zona a quincenal. Evidencia: Recorte del registro de limpieza con la frecuencia modificada. (nc brc 4.11.1) a) See non-conformity 1.1.12 b) Eulen is informed to increase the frequency of cleaning said area to biweekly. Evidence: Clipping of the cleaning log with the modified frequency. (nc brc 4.11.1)			

4.11.2	El actual procedimiento de verificación de la limpieza no garantiza que se alcancen los niveles adecuados de la misma, por ejemplo se detecta pequeños fragmentos de vidrio en el suelo de la línea 8 después de que el producto este cerrado The current cleaning verification procedure does not guarantee that adequate levels of cleaning are achieved, for example small glass fragments are detected on the floor of line 8 after the product is closed.	Se limpia la zona Evidencia: registro de verificación R_PC_1001_48_01 The área is cleaned Evidence: verificaticon record R_PC_1001_48_01	Se modifica el procedimiento PC_1001_48 Actuación ante roturas de vidrio en linea Evidencia: procedimiento modificado (PC_1001_48 Actuación ante roturas de vidrio en línea páginas 2 y 6) Procedure PC_1001_48 Action in the event of glass breakage on the line is modified. Evidence: modified procedure (PC_1001_48, pages 2 an 6)	No se habia tenido en cuenta la posibilidad de desprendimiento de fragmentos de vidrio posteriores a la puesta en marcha de la maquina No allowance was made for the possibility of glass fragments becoming detached after the machine had been put into operation.	11-08-2024	Jose Emilio Pertierra
4.14.7	En la visita a las instalaciones de refineria se detecta red antipajaros descolgada During the visit to the refinery facilities, an unhooked anti-bird net was detected	Se coloca la red antipájaros. Evidencia: NC 4.14.7 la red antipájaros colocada The anti-bird net is placed. Evidence: NC 4.14.7 the anti-bird net placed	Indicación a la persona que los realizada para que en caso de haber obras en las infraestructuras se revise dicha zona semanalmente. Evidencia: Comunicado (comunicado nc brc 4.14.7)	Las revisiones se hacían mensualmente sin tener en cuenta las infraestructuras que están en obras. Revisions were made on a monthly basis without taking into account	11-08-2024	Jose Emilio Pertierra

			Indication to the person who carried them out so that if there is work on the infrastructure, said area is reviewed weekly. Evidence: Indication (realese nc brc 4.14.7)	infrastructures under construction.		

Comments on non-conformities
Click or tap here to enter text.

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Lead auditor		
Auditor number	**First name**	**Second name**
21014	Jose Emilio	Pertierra

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
Jose Emilio	Pertierra	21014	Lead auditor	2024/07/15	08:00	16:00	Physical	
Jose Emilio	Pertierra	21014	Lead auditor	2024/07/16	08:00	16:00	Physical	
Jose Emilio	Pertierra	21014	Lead auditor	2024/07/17	08:00	16:00	Physical	
Jose Emilio	Pertierra	21014	Lead auditor	2024/07/18	08:00	14:00	Physical	
Manuel	Formoso	24539	Witness auditor	2024/07/15	08:00	16:00	Physical	
Manuel	Formoso	24539	Witness auditor	2024/07/16	08:00	16:00	Physical	
Manuel	Formoso	24539	Witness auditor	2024/07/17	08:00	16:00	Physical	

Manuel	Formoso	24539	Witness auditor	2024/07/18	08:00	14:00	Physical	

Detailed Audit Report

1. Senior management commitment

Company´s policy included in the Management plan (Management Manual included in annex I), under review 6 dated 03-04-2023 and signed by the General Manager which include all aspects requested in the protocol. Also, the Food Safety Concept was included. Policy sent to the staff and displayed in informative posters and also in the web.

The Policy is broken down into annual Quality and Food Safety goals. The objectives set for the year 2023 are the following:

2023 goals:

- Cleaning of cisterns. Installation of a tank washing station. In the process of implementation, it has been moved to 2024.
- Use of nitrogen in line 3. (production stopped due to a technical problem)
- Cleaning of the tank. Use of a washing system in the tank. Procedure complete
- Evaporation ponds: under construction

2024 Goals

- Cleaning of the cistern under construction. Quarterly frequency established
- Nitrogen line. Reduce the number of incidents due to cylinder problems because the cylinder collapsed. Follow-up on the waiting of the Sevo. Quarterly Frequency established.
- Separation of the lines per format. Production increased in 25%. Quarterly frequency established.
- Sustainability goal. Improve the treatment of water in Vilches plant. It is currently being implemented

The results of the goals obtained as well as its policy, food fraud, food defense, suppliers, human resources, complaints, NCs/CAs, results of audits, etc were reviewed by the management. Annual review: last one completed on the 19-02-2024 with suggestions for its improvement. The company management attended to this meeting.

Company´s communication procedure available.

For each objective, a plan has been defined with intermediate goals or milestones, resources, responsible parties and deadlines. The monitoring of objectives is carried out at each stage and is reflected in the same format for establishing objectives. In addition, a quarterly review is carried out at the monthly Quality, product safety and legality meetings. The minutes are reviewed: for example, for January-February and March, as well as the specific monitoring of the nitrogen line objective (January 2024 study of volumes packaged, April 2024 separation of lines ....). The plant manager, quality manager and quality manager are in attendance.

In addition, the Quality Committee meets monthly to discuss the most relevant aspects. Meeting minutes are reviewed. There is also a daily quality and production meeting to discuss the most relevant aspects. The content of these meetings is summarized in monthly minutes that are sent to the interested parties.

The minutes of the monthly meeting held on the 27-03-2024 and 30-11-2023 among others were reviewed.

The company has several mechanisms in place to be informed of applicable legislative and technological changes. Updating is done by means of communiqués from the associations, and they have controlled through a contract with LEX-AINIA a profile is created and the legislation is sent, as well as online consultancy. The mail is revised for example 9-07-2024 (legislative profile).

The applicable legal texts are available on the website.

The establishment's management team has defined a clear plan to drive the development and continuous improvement of a **food safety and quality culture**, food safety culture activities (4 pillars GSFI). Vision-mission (first semester), consistency (review of responsibilities), personnel (food safety training) and adaptability (in implementation).

Food safety culture training is provided annually. The applicable legal texts are available on the website.

In addition, a mailbox has been set up through which employees can confidentially communicate their opinions.

Indicators have been defined for monitoring purposes. Food safety culture objectives:

Good Practice review (monthly inspections in the plant). e.g: 2024: January 74,38%, February 80,63% and March 85,94 %.

In relation to the structure of the company: Vilches 2024 July organization chart. The CEO is in charge of operations, commercial, HR and quality. The INDUSTRIAL part is divided into maintenance, packaging, quality and warehouses, warehouse operations, manufacturing and planning.

There are job profiles where staff know their responsibilities, procedures and requirements.

As for external personnel (consultants, auditors) internal audits have been carried out by SOSTENIA and Marife Montes.

Last health report: 28-05-2024 (refinery) and (23-05-2024). Food safety audit. Time of visit:

No non-conformities were detected. The conclusion of the audit was CONFORM, according to this report.

Corrective actions regarding the previous audit:

Nc 01: During the visit to the facilities, it was found that the drains are properly maintained.

Nc 02: during the visit to the facilities, no holes were detected in the wall of the auxiliary materials store.

Nc 03: it has been possible to check that the ceiling panels in the packaging room are correctly positioned.

Nc 04: it has been tested that the mosquito netting in the changing rooms is correctly positioned.

Nc 05: during the inspection carried out it has been possible to verify the elimination of situations that could give rise to sources of foreign bodies the points accumulations of varnish, green plastic shavings from the purification plant on line 7 and stickers and detachments.

Nc 06: in relation to the cleaning of this area, there was again an accumulation of white dust on the stainless steel oil storage tanks in the internal warehouse. On the other hand, cobwebs have been removed in the finished products and auxiliary materials warehouse.

Nc 1.1.2: Performance measurements of the plan's activities are not considered to be entirely adequate, as they use parameters that are not related to culture (e.g., PRL).

On the other hand, the employees' knowledge of the food safety culture plan is considered to be deficient during the interviews held with them (misconceptions or lack of knowledge of the plan).

Performance measurements of the plan's activities are not considered entirely adequate, since parameters not related to culture are used (for example, occupational risk prevention).

Furthermore, employees' knowledge of the food safety culture plan is considered deficient during interviews with them (misconceptions or lack of knowledge of the plan).

Nc 1.1.12 In relation to the efficacy of the corrective actions implemented, it is detected that nc 4.11.1 has been repeated

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

2. The Food Safety Plan – HACCP

HACCP_1001 plan available (under version 12 dated 23-05-2024) based on the CODEX ALIMENTARIO principles with scope to all products and productive processes present in the industry. The last modification was due to the English translation. As for the previous review 11, the modification in the filtering phase with reference to the micro light was checked.

HACCP_1001 Manual available. Each section has its own revision number and date. In Chapter 1 'General Aspects' (under review 24, adapted to review 9. Dated 2306-06-2024), the members of the HACCP Team are described in Chapter 1 'General Aspects' (under review 24 adaptation to review .9, 2306-06-2024).

- Plant Manager
- Quality Manager
- Lab Manager
- Refinery Manager
- Plant Coordinator
- Maintenance Responsible
- Plant Quality Responsible
- Food Safety Responsible (Coordinator)
- R+D Responsible
- Responsible for the purchase of raw materials

The HACCP team is multidisciplinary and includes operational staff and HACCP training. The staff has a wide in the sector. Regular training is given: e.g., 12-01-2023.

The company has established the following prerequisites:

- Potability of water
- Cleaning and disinfection
- Handler training
- Supplier management
- Good Handling Practices
- Pest control
- Traceability
- Maintenance
- Waste disposal

Product described in Chapter 'Product Description' (under review 6 dated 28/07/22) of the HACCP_1001 Manual. Its stability, conditions of use, intended use and population at risk are included. A full product description is also included in the Technical Data Sheets of the finished product.

12 flow diagrams have been defined. Procedure verified in situ by the members of the HACCP Team. All the phases of the process as the different production shifts are operative:

- Packaging of virgin olive oil or extra virgin olive oil in bag in box. Procedure verified in situ on 27-05-2024.
- Packaging of filtered and unfiltered virgin olive oil or extra virgin olive oil. Procedure verified on site dated 02, 05, 29-05-2024
- Bottling of olive oil or olive pomace oil. Procedure verified on site dated 29-05-2024
- Packaging of seed oils. Procedure verified on site dated15-05-2024
- Packaging of fatty preparations. Procedure verified on site dated 28-05-2024
- Filling of tanks, flexitank with seed oil. Procedure verified on site dated 14-05-2024

- - Filling of tanks, flexitank with olive oil or olive pomace oil. Procedure verified on site dated 28-05-2024.
- - Filling of tanks with virgin olive oil or extra virgin olive oil. Procedure verified on site dated 05-06-2024
- Bottling of olive oil or olive pomace oil in drums. Procedure verified in situ dated 15-05-2024.
- Packaging of virgin olive oil or extra virgin olive oil in drums. Procedure verified on site dated 14-03-2024.
- Physical refining. Procedure verified on site dated 19-06-2024.
- Chemical refining. Procedure verified on site dated 19-06-2024.

Process stages: Reception and storage of oils, preparation of lots, soil filtration, plate filter filtration, metal filter filtration, bag filter filtration, filling, capping, labelling, coding and boxing, storage, dispatching of goods.

Identification and hazard analysis. The following hazards were reviewed: (physical, chemical, radiological, microbiological, food fraud, food defense, allergens) and have been assessed in terms of Probability (P) and Severity (G).

Probability (P) is scored with:

- High: 5. Occurs at least once every semester.
- Medium: 3. Occurs at least once a year.
- Low: 1. Occurs at least once in 2 years or does not occur at all.

Severity (G) is scored with:

- High: 5. May result in serious illness or death.
- Medium: 3. May cause minor harm or illness.
- Low: 1. No harm or illness.

Probability (P) x Severity (G):

- Unacceptable Hazard > 9
- Acceptable Hazard ≤ 9

If hazards are deemed unacceptable, they will run through the decision tree to determine if these are considered as CCPs.
2 Critical Control Points (CCP) have been identified:

- CCP 1:

  - Phase: Discolouration.
  - Hazard: Chemical.

- Critical limit: Benzo(a)pyrene: 2 ppb. Sum of benzo(a)pyrene, benzo(a)anthracene, benzo(a)fluoranthene and chrysene: 10 ppb.
- Preventive measures: Application of the pomace oil procedure. Specify process parameters.
- Monitoring: Analysis of each batch of refined pomace oil.
- Corrective action: Rejection of product and reprocessing.
- Records: Non-conformity. In-process quality control record.

- Critical limits established for CCP 1 (Benzo(a)pyrene: 2 ppb. Sum of benzo(a)pyrene, benzo(a)anthracene, benzo(a)fluoranthene and chrysene: 10 ppb) are legal limits established in legislation. Analysis of each batch carried out. Example. Sample: High Oleic Sunflower 60% L012. Date of analysis: 20/06/23. Parameters: Benzo(a)pyrene < 0.5 ppb. MRL < 2 ppb. Sum PAHs < 10 ppb. MRL < 10 ppb. Signed by the Pollutants Officer (Ana Márquez Márquez) and by PCQI dated 20/06/23 at 16:00.

-CCP 2:

- -Phase: Blowing of the container.
- Hazard: Physical.
- Critical limit: P blown ≥ 1.5 bar and ≥ 3 bar at L8. Maximum blowing P ≤ 7 bar.
- Preventive measures: Application of the Maintenance Programme, review of air equipment, compressor and filters. Verification of blowers. Verification of blowing pressure prior to packaging.
- Monitoring: Verification of pressure at the start of production by Line Manager and quality verifier. Verification of the blowing machine stop due to a pressure drop.
- Critical limit: Benzo(a)pyrene: 2 ppb. Sum of benzo(a)pyrene, benzo(a)anthracene, benzo(a)fluoranthene and benzo(a)fluoranthene.
- Corrective action: Pressure checked with a standard pressure gauge. In case of malfunction, notify the Maintenance Department for its replacement. Product rejected.
- - Records: Non-conformity. In-process quality control record.

Annex I Validation of the CCP air blowers. Date: 14/02/22. CCP. P ≥ 1,5 bar and ≥ 3 bar on Line 8. 4 samples are introduced: pieces of paper, glass fragment, plastic and screw. P: 0.5 - 7.5 bar. Bottle formats:

- L1, L3 and L6: PET. 1.000 ml

- L5: PET. 5.000 ml

- L4: PET. 500 ml, 750 ml, 1.000 ml

- L8: Glass and PET. 500 ml, 750 ml, 1.000 ml

- L7: PET. 1,500 ml, 2,000 ml, 3,000 ml, 3,780 ml, 5,000 ml.

Conclusions: CCP limit is set at P ≥ 1.5 bar < 7 bar. P > 1 bar are sufficient to eject the different foreign bodies. The upper working limit is ≤ 7 bar, since at P of 7.5 bar it is not possible to ensure the removal of foreign bodies inside the tank. It must be taken into account that due to the configuration of the blower in the case of Line 8, the P must be > 3 bar for the operation of the line.

Control Points (CP).

Six-monthly verification of HACCP by all members of the HACCP Team by means of internal audits, analysis, sampling, deviations and complaints. The latest verification of HACCP carried out on 28-06-2024 is checked.

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

3. Food safety and quality management system

3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

The quality manual of the company MIG INTEGRATED MANAGEMENT MANUAL has been defined.

It is within an internal network and available to those responsible.

It is available in paper and digital format, with personal access to the intranet. Some of the documentation is translated into English. It is documentation related to food safety that affects customers.

As for the HACCP, the procedure has been documented. The HACCP_1001 system is available. Each chapter of the HACCP has its own review and date of application.

All documentation reviewed during the audit is in compliance with the parameters established. It has been possible to check the management of the different modifications of some of the documents, e.g., HACCP.

All the documentation reviewed during the audit is compliant. It has been possible to verify the management of the different modifications of some of the documents, e.g.: HACCP.

PG_01 procedure and documented information under review dated 17-01-2018 (where the system for the elaboration, approval, modification and revision of the documents of the quality management system is described). The correct implementation of the procedure was verified during the audit.

In addition, there is a list of documents in force dated 28-06-2024

List of applicable legislation divided by groups which are updated.

Records are kept for a minimum of 3 years unless these are required by the client.

All documents are uploaded to the cloud and backup copies are made. CERTOOL software is used.

3.4 Internal audits

Procedure managed through PG 08 Internal audits under review 1.7. Internal audit programme available.

These have been carried out, according to the risk assessed and based on legal requirements or not, NCs from previous audits and whether it is a customer requirement or not. The result is: all of them are low risk, except for the standards

relating to their premises, which is medium. Everything is audited annually except for this chapter which is audited twice a year.

24.02.23. Requirements that had previous NCs.

Chapter 4: twice a year.

- March: chapter 1 and 3

- April: chapter 2

- June: 4 and 7

- July: FSMA

- September: 5 and 6

- October: chapter 4

The last 4 audits were reviewed:

20-06-2024, chapters 4 and 7. Procedure audited by Sostenia, 5 deviations and 2 checks. Example: 6 Non-conformities and 4.3.9, 7.2.1,.4.4.1, 4.15.6, 6.2.2, 4.2.4.

- 04-04-2024: HACCP sections. Section 2 and 2.2 of IFS: 1 Deviation.
- 15-03-2024. Sections 1 and 3. Sostenia: 2 deviations: 3.6.4 and 3.9.3.

Audits carried out: 3 of them were performed by SOSTENIA with an independent auditor, CV of José Carlos Arcos. This was reviewed and found to be correct with 1 of them managed by Gestión Integra CIN (Marifé Montes).

The corrective actions and communication with those involved are reviewed, a schedule is assigned to them and they are monitored.

Monthly inspections carried out and reviewed, for example:

25-06-2024 performed by S.M (quality technician). 71.3% Deviations: use of insulating tape solvent blotting under the table.

24.05.2024: score 77,5% changing rooms poorly cleaned, temporary fix made in the packing machine.

- 31.01.2024: score 75.0 %. Deviations: entrance door obstructed.

All are usually closed immediately on the spot. With regard to the management review, a summary of the result of the inspections was made.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

SUPPLIER MANAGEMENT PGH _1001_ 09 company´s procedure available. Suppliers under review 7 dated 20-07-2023, which defines the criteria established for the approval of suppliers. Five groups of raw materials and/or materials have been defined:

1.- Edible vegetable oils

2.- Auxiliary materials in direct contact with product

3.- non-direct contact auxiliary materials

4.- Other materials in direct contact with product (filters, filtration coadjutants)

5.- Other raw materials (vinegar, essences, condiments, additives, omega 3).

6-. Service providers

According to the risk analysis:

For each raw material group, a risk analysis is carried out on the basis of: 01.02 risk assessment raw materials-Contamination due to the presence of allergens

- Contamination due to the presence of foreign bodies

- Chemical Contamination

- Microbiological Contamination

- Substitution or fraud

- Cross contamination present in different varieties or species

Associated risks that are subject to a legislative control.

Importance of the raw material for product quality

Importance of the raw material in the company's product volume.

The risk analysis is performed on the basis of the score obtained according to these criteria. Also, a weighted average is made. Suppliers with a score <1.403 are low risk and those with a score >1.403 are high risk. All suppliers have been assessed as low risk. Last assessment made on 30-06-2023

Raw materials assessed and high risk are:

- EVOO and EVOO

- Packaging (Pet) and cap

- Packaging (glass) and cap.

- Metal capsule, oregano, chili pepper, black pepper

- Organic vinegars and PDO

With regard to oil suppliers, a special treatment was applied. Three groups have been established which are based on the volume of oil served:

- Type A (more than 600,000 kilos per year).

- Type B (between 100,000 and 600,000 kilos per year).

- Type C (less than 100,000 kilos per year).

Type A: these are not GFSI certified and must be audited (>50%), with the exception of lampante oil, crude pomace and brokers, which will be asked to complete a questionnaire; the brokers will be asked to complete a traceability exercise with the manufacturer.

Types B are approved on the basis of questionnaires made or audits if required by the customer.

C types are approved on the basis of analytical controls carried out upon receipt of the product.

In addition, there is a table with the requirements and documentation necessary for the approval of the different types of suppliers

The approval of the following suppliers was reviewed

- Supplier La Rentilla: Lampante oil. Procedure approved by audit dated 30-04-2024. ACESUR auditor (Javier Exposito).
- Supplier: Aceitunas Jaén. Approval made by questionnaire dated 01-07-2024.
- Supplier: OLEOJAME. Approval made by audit dated 19-06-2024. ACESUR Auditor (Javier Exposito).
- Clariant: refinery earths. Approval made by questionnaire/traceability. Low risk dated 18-04-2024.
- LOGOPLASTE bottle supplier. Approval made by GFSI. BRC PACKAGING DNV
- Bericap cap supplier FSSC 22000 approved.
- LABELS supplier. Procedure approved by homologation, questionnaire made on 21-06-2023, Traceability 17-07-2024
- BOX supplier. Supplier: S. KAPPA approved by BRC

Types A and B will be re-assessed every 3 years, although documentation will be reviewed annually.

Suppliers may be de-approved due to the stop of purchases for more than 3 years, quality problems repeated; supply service does not cover Acesur's needs or non-compliance with the requirements necessary for its approval.

With regard to oil, this is based on the incidences detected during the analyses carried out.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Procedure approved for raw materials. Inspection and tests carried out for samples prior to its purchase. CP 1001 22 under review 4 dated 22-04-2023.
Quality control established during the reception of goods CP 1001 51 under review 9.

All batches of oil are analyzed during the reception of goods in accordance with a predefined control plan. As for the traceability exercise carried out, the analytical control records of the raw materials used during production with a reference batch has been reviewed.

With regard to the NC and corrective actions procedure, every time an incident occurs, a NCP (non-conformity to supplier) is raised.

Documentation reviewed during the audit:

- Supplier Jabalquinto divided by group. R0595BBK and R7435 BBM tanks. It was received on the 5-03-2024. R 0595 BBK tanker. Delivery note number 80810185 dated 5-03-2024. Document 1C9F40A attached number 2811BE. Lab analysis with bulletin number CT/202408468 peroxide acidity, tasting moisture and organoleptic analysis. Annex 1: I CP 1001_27_ internal input control plan is reviewed: moisture, volatile, delta K acidity and peroxides, tasting acids. This is sent to warehouse D17 (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3. Cleaning certificate 5 March 2024 carried out in their own cleaning centre.
- Delivery note number 80810238 dated 5-03-2024. 1C9F40A... AABB6E5 document attached. Laboratory analysis bulletin number 202408480: peroxide acidity, tasting moisture and organoleptic analysis. Annex 1 I CP 1001_27_ internal input control plan is reviewed: moisture, volatile, delta K acidity and peroxides, tasting acids. This is sent to warehouse D17 (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3 Cleaning certificate 5 March 2024. Procedure carried out in their own cleaning centre.
- Radicel batch 31353001. Pest-free seal, correct quantity and quality.
- Compakcel, lot number 31046003. Pest-free seal, correct quantity and quality. Declaration of conformity
- **Lamp oil: La Rentilla** supplier . tank R 8429 BBL. Delivery note number GR/170-2024. Lot N140223. Date of entry 1-03-2024. Goes to tank D 43. Analytical bulletin. Number 010000508228 dated 01-03-2024. Annex 1 I CP 1001_27_ the internal control plan during the reception of goods was reviewed: moisture, volatiles, delta K acidity and peroxides, acid tasting.
- **Supplier: OLEOJAME.** R 3268 BBG tanker. Delivery note number AS37. Lot 04901824 with date of entry 1-03-2024. It goes to D 43 depot. Analytical bulletin Number 01000057989 dated 01-03-2024. Annex 1 I CP 1001_27_ **the internal control plan** carried out during the reception of goods was reviewed: moisture, volatiles, delta K acidity and peroxides, tasting acids. This is sent to warehouse D43 (external warehouse). Cleaning certificate 5 March 2024 carried out in their own cleaning centre.
- **Supplier: LOGOPLASTE bottle**. Datasheet: bottle 1 l square smooth RPET (30 g) under review 3 dated 29-03-2022. Declaration of conformity dated 29-03-2022. Batch 18-03-2024.
- **Bericap cap supplier** Datasheet: EV 29/19 MAG (7745) under review dated 09-03-2016. Declaration of conformity dated 30-06-2022. Batch 24943130. Delivery note 81233621 dated 5-12-2023. Migration analysis. Simulant CNE, dated 30-06-2022 A, B D2.

3.5.3 Management of suppliers of services

Service suppliers assessed according to the risk established and the following risks:

- Product contamination
- Fulfillment of legal requirements
- Contamination

An assessment of these hazards is made on the basis of likelihood and severity.

The approval of some service providers is reviewed, for example:

- Compressor maintenance: CARRIER maintenance.

- RENTOKIL (pest control): service compliance: deadlines and service. 100%

- Analysis carried out in the lab. Criteria accredited and in compliance with the deadlines set for the analysis (e.g. MICROAL 70% compliance. BIOMEDAL 82.4%.

- Calibration companies: METTLER. Procedure accredited and service compliance: 100%.

- Carriers: by service OK 100%.

- Single-dose PET packaging subcontractor (health products). 97% in compliance assessment.

It has been included in the supplier management procedure PGH 1001_09 under review 2 (analysis carried out in the laboratories, calibration laboratories, packaging companies, certifiers, DDD, cleaning and maintenance.

3.5.4 Management of Outsourced processing

The company has subcontracted the packaging of tubs and sachets of single-dose extra virgin olive oil.

- Product Data Sheet EVOO code 303451, 300x10 ml sachets o. vex La Española, BB 15 months, logistic sheet dated 05.10.2020. c which includes: Product description, stability, ingredients, nutritional data, conditions of use. Avoid direct sunlight, cover the container tightly after consumption, organoleptic characteristics, physical and chemical characteristics, allergens, microbiology, intended use, population at risk, GMO, country of origin, batching.

This product is subcontracted to Productos Salud, Ltd (GFSI certified, IFS food V 8, valid until 10.08.2024 by Acerta) packaging order code number 32076

Packaging material:

- Supplier: SP GRUPO. Datasheet APET H/PE EPEL. Date of issue: 10-05-2023. Base sheet. Declaration of conformity dated 10-05-2023
- Supplier: SAMAFRAVA PET+PE complex under review 15 dated 15-01-2024. Declaration of conformity dated 18-05-2023
- Inspection and testing:
- As for the raw material (oil) this is sent to the in-house laboratory to check the suitability of the oil. The oil goes in IBC Example: product is 303540 AOVEX lot number 0106; production date: 15-04-2024, lot number 0934M3E036, 675 litres. BULK with serial number e24036. Analysis and tasting carried out in the lab: INDLAB ENAC. with 4.1 fruity, analysis number A/202405334. Product packaged in AOVE 300x15 ml tubs; AOVE goes to ULMA. Lot number 0106. At the entry of the internal lab, an analysis is crried out with report number 0106 dated 22-05-2024 with na average error of t 4
- PROSALUD has sent a record with production included. The record established for the control of packaging and traceability was established (packaging 433036 4484 and 4400) as well as its cap 23-000703 12/27.

- IFS health product with COID 32076.

- In terms of traceability, the procedure is audited from time to time dated 23-05-2022. A traceability exercise was requested.

3.6 Specifications

Product specifications are available for all raw materials, processing aids, reagents and packaging material as well as finished products.

Product specifications are reviewed by the Quality Department every 3 years or whenever there is a change in the procedure.

The following procedures among others were reviewed:

Finished Product:

- Product: 0,4 light Remano 12x 1 PETCU. Technical File: FT_01_04_17_09 under 1 dated 16-02-2024 olive oil (85/15). The ALDI specification of the platform was also reviewed.
- FT AO GAMME OLIVE 09-2023. CARREFOUR
- Raw materials:
- EVOO: Datasheet FT_01_01_00 under review 7 dated 03-07-2024 (Aove)
- RADICEL datasheet under review 5 dated 04-07-2022. Declaration of conformity dated 14-07-2022. (certificate of radiation, allergens, with no presence of GMO).
- COMPACKCEL datasheet under review 8 dated 04-07-2022. Declaration of conformity dated 14-07-2022. (radiation certificate, allergens, non-GMO).
- Lamp oil datasheet. FT_01_03_00 under review 03 dated 23-01-2020.
- TONSIL SUPREME 115 FF datasheet under review 3/2024. Declaration of conformity dated July 2024
- Traceability of auxiliary materials
- Datasheet: 1-litre square smooth RPET bottle (30 g) under review 3 dated 29-03-2022. Declaration of conformity dated 29-03-2022.
- Stopper Datasheet: EV 29/19 MAG (7745) under review dated 09-03-2016. Declaration of conformity dated 30-06-2022.
- Label art fiche: 410053 approved dated 27-01-2023 last review under review 2).
- 6x6 box fiche: procedure approved by 19-06-2023 sketch 104307-1-1.
- Film supplier. 12BT 501 REV 4 17-08-2021 datasheet
- a- olive oil (85/15). The ALDI specification of the platform was also reviewed.
- - FT AO GAMME OLIVE 09-2023. CARREFOUR
- All product specifications are reviewed in case of any changes every 3 years at least.

3.7 Corrective and preventive actions

PG 07 NON-COMPLIANCE AND CORRECTIVE ACTIONS under review 7 dated 11-10-2023

The corrective actions taken to address the non-conformities identified in the internal audit have been reviewed.

The records include: a root cause analysis, immediate and corrective actions against the cause, timeframe and responsible parties for its implementation, as well as a review of closure and assessment of its efficacy. As for the efficacy of the root cause analysis this has been verified and there has been no repetition of non-conformities, except for the one related to the cleaning of the warehouses.

3.8 Control of non-conforming product

The procedure CONTROL OF NON-CONFORMING PRODUCT is in place. The authority to decide on the treatment of non-conforming product lies with different people and depend on the stage and the reason for the non-conforming product.

In the case of non-conforming products, these would be sent to the refinery.

The identification of non-compliant product has been observed in case of a paper label with chopped backing and back label Wholefood market avocado oil 750 ml.

3.9 Traceability

Traceability is managed with PG 1001 08 under review 10. TRACEABILITY OF PRODUCTS dated 24-11-2024

The company has implemented a traceability system that allows it to follow the trail through the different stages of production and distribution. This system is supported by the SAP management software tool and the records of the quality management system was included.

Product batching according to 10-digit code, example: batch number 0952T5P068, olive oil product, packaging date 04.05.22. 095 Julian day, 2=year, T=afternoon shift, 5=packaging line, P=pure oil, 068=bulk batch used for domestic market.

It may be customer or export specific, where it will be DDDAA. Julian day DDD and YY is the year.

Several traceability tests are carried out: from raw material to final product and vice versa.

- 24-06-2024, AOVEX Remano 12x750. ML MBJV AUST. Lot 14324 for 50 minutes. Product code 307655. Top-down traceability.

From end product to raw material.

- From end product to raw material, AOVEX COSUR ECO-JAS. L.03524. 50 minutes of completion. ACESUR supplier in La Roda.

During the audit, a traceability test was carried out on a product randomly chosen by the auditor:

Product. 0,4 light Remano 12x 1 PETCU.
Lot number L- 07824 export
Technical File: FT_01_04_17_09 under review 1 dated 16-02-2024; olive oil (85/15). The ALDI specification included in the platform was also reviewed.
- Work order number 10010163952 18-03-2024
- Packaging date: 18-03-2024
- Total production: 1899 boxes, 15x 1 l. 6 bottles c/u
- BBD: 18-03-2026. Shelf-life analysis, 24 months. Oil stability study, dynamic parameters K and peroxide. Product bottled in December 2021. Product shelf-life February 2023. % acidity and peroxides
- MICROAL nutritional value: ENAC Nº 148/LE lab dated 10-10-2023. Analysis Number, LAB/136361
- Dispatching: 1 dispatching, notes corresponding to 455 boxes, 6 bottles each.
- Current stock. - 0 units. They work on demand.
- Transporte Boreal logistica slu driver Blas Martinez Fernandez. Date of dispatch: 23-04-2024. (from Vilches to 2H)
Sign letter of commitment, 18 July 2024. Performance: 3 anomalies.

- Other transport services: J-Carrion with letter of undertaking (R/pgh_101_ 09/08 under review 3 dated 21-04-2023) Procedure signed on 16 May 2023.
Traceability of extra virgin olive oil.
Two tanks.

Supplier: Jabalquinto from R0595BBK group and R7435 BBM tank. These were received on the 5-03-2024.

R 0595 BBK tanker.

Delivery note number 80810185 dated 5-03-2024. Document attached number 1C9F40A 2811BE. Lab analysis bulletin number CT/202408468, peroxide acidity, tasting moisture and organoleptic analysis. Annex 1 I CP 1001_27_ internal input control plan is reviewed: moisture, volatiles, delta K acidity and peroxides, tasting acids. This is sent to warehouse D17 (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3. Cleaning certificate 5 March 2024 carried out in their own cleaning centre.

Delivery note number 80810238 dated 5-03-2024. Document attached number 1C9F40A..AABB6E5. Lab analysis bulletin number 202408480 peroxide acidity, tasting moisture and organoleptic analysis. Annex 1 I CP 1001_27_ internal input control plan is reviewed: moisture, volatiles, delta K acidity and peroxides, tasting acids. This is sent to D17 warehouse (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3 Cleaning certificate 5 March 2024 carried out in their own cleaning centre.

Filtering of AOVE. AGROVIN from lot number 072402091. Delivery note number 80181 305 on the 15-03-2024

Certification approved by GFSI FSSC 22000.

100 % performance. OKB

COMPACKCEL Technical File, lot number 31353001. Delivery note number 80180844 on the 7-03-2024.

Once filtered, these are sent. On 7-03-2024 they are sent to deposit D 15. The analytical bulletin of batch LM 202401735 is reviewed.

Analyses are carried out on AOVE from b17 deposit.

- Physical-chemical analysis of EVOO is external to tank B17. INDLAB ENAC Lab number 1089/LE 2141. LOT 24020 and Report Number a/202404732.
- Physical-chemical analysis of EVOO is external to the B17 tank. INDLAB ENAC Lab number 1089/LE 2141. LOT 24020 Y Report Number a/202404205

Traceability of Lampante Olive Oil.

three tanks.

La Rentilla supplier. R 8429 BBL tanker. Delivery note number GR/170-2024. Batch N140223. Date of entry: 1-03-2024 sent to depot D 43.

Supplier: Aceitunas Jaén, R 0595 BBK tanker. Delivery note number 0093. Lot A9142024. Date of entry 1-03-2024 which is sent to D 43 warehouse.

Supplier: OLEOJAME. R 3268 BBG tanker. Delivery note number AS37. Lot 04901824, Date of entry: 1-03-2024 which is sent D 43 depot.

Product refined with TONSIL, earth Supplier: CLARIANT. Lot DES 0263298. Delivery Note number 54030923 dated 5-01-2024.

The refined oil goes to tank D-30 where an internal laboratory analysis is made with reference 24104 of tank D030. Refined olive oil (date 11-03-2024). **The analysis plan to produce refined olive oil was reviewed.**

85%-15% BLENDING

These are sent to D15 with an analytical control analysis of pure olive oil dated 11-03-2024 and soft olive oil. It is correct. They are sent to D55 and it is from this deposit where they are packaged.

The percentages are checked to ensure these are correct.

Technical data sheet of soft olive oil. It is the one for the final product seen at the start of the test.

Packaging material

It is packaged on line L-1 and then it is placed in L-3 line.

LOGOPLASTE bottle supplier. Lot dated 18-03-2024.

Bericap stopper supplier. Lot number 24943130. Delivery note number 81233621 dated 5-12-2023.

LABEL supplier lot number 331403. Back label and same lot. Delivery note number 24001179 dated 29-01-2024.

Supplier of BOXES: SKAPPA. Lot number 580078.1. Delivery note number 167885 dated 6-03-2024.

Supplier of film: Hispacom. Lot number 580078.1. Delivery note: ONT 6 dated 13-12-2023.

Mass balance:

Product packed in liters. Bottles packaged: 29835 units or liters (daily packaging part).

Orders: 813 units out of 1530. There are 4 more orders for a total consumption of 29304 liters.

The difference is 531 units which are in stock. 29835-29304: 531.Supplier: LOGOPLASTE bottle with lot number dated 18-03-2024.

Process control:

- R/IC 1001 46/01 process control under review 6. Quality control of the checker and hourly checks (photos, anomalies, incidences, consumption, material description, SAP batch, warehouse quantity.
- Daily packaging report number 10010163952.
- Control of the coil present in the line
- Fitting report number 10010164813.
- Product dispatched by the client. Inspection carried out during the dispatching of goods. Transport
- Control of the effective content carried out
- ACESUR lab dated 11-04-2024. Number 040001332218. Acidity, moisture, impurities and acid profile.

External analysis plan, annex I, olive external control plan (traceability)

- Annual INDLAB ENAC: analysis of metals carried out in the lab. OK. Number A/202401957.
- MOHS and MOAHS, INDLAB ENAC laboratory: Mohs and moahs . OK. Number A/202405638.
- SIX-MONTH analysis for GLICIDOL 3MCPD: INDLAB ENAC laboratory Glycidyl esters, 2-MCPD AND 3-MCPD. Correct. Number A/202401960.
- ANNUAL PCB DIOXINS: INDLAB ENAC lab: Glycidal esters, 2-MCPD AND 3-MCPD. Correct. Number A/202401962.

- MELAMINE AND CYROMACHINE SEMI-ANNUAL INDLAB ENAC laboratory Melamine. Correct. Number A/202401963.
- PHTHALATES: ANNUAL INDLAB ENAC PHTHALATES OK. Number A/202401961
- Pesticides: INDLAB ENAC Pesticides OK. Number A/202401956
- Ciromycin INDLAB ENAC Ciromycin lab: OK. Number A/202403446

Adequate mass balance. Test carried out in less than 4 hours.

N C 3.9.2: During the visit to their facilities, a 1000 litre tank of unidentified AO light was detected in the spraying area.

It was checked during a visit to their facilities that a 1,000-litre tank of unidentified AO light was detected in the spray area.

3.10 Complaint-handling

The company has implemented an efficient system for the reception and handling of customer complaints. It is managed through the CP 20 procedure. Management of complaints carried out in the packaging plant 4th edition dated 1-07-2024 (it was suited to CERTOOL).

Complaints are usually received through the Commercial Department and then are transferred to the Quality Department for processing, consisting of an analysis of the cause, definition of corrective anomalies, corrective actions and reply, if appropriate, to the customer.

The company received a total of 230 complaints in 2023 and 122 in 2024.

Type of complaints:

- 28: production/packaging

- 40 organoleptic

- 33 %: tasting

- 10: logistics

- 27: others: physical-chemical. This is significantly lower than last year.

There is a record of the trends, evolution and monitoring of complaints from January to December, an annual summary of which shows improvements in the trends.

The most relevant complaints are dealt with the monthly meetings of the Quality Committee held. In addition, and during the management review, a global and detailed analysis is made of the complaints received during the period reviewed.

In addition, customer satisfaction surveys are conducted annually.

The following complaints were reviewed during the audit:

72/2024, 23-04-2024, response on AOVE La Española product. Different values. Different results obtained in sensory tasting. The results and solutions are explained.

33/2024, 01.03.2023. defective stopper: when you open it, it doesn't open properly. Customer from Amazon. The pourer was lost. For this reason, optical inspectors in Dos Hermanas were included. Corrective Action: adjustment of the roller sensors. Information is sent to the customer to the various questions risen.

62/2024: cause of wrong label. The customer claims that the labelling should contain a series of information. The customer's specifications are pending since 11-07-2024. It is on hold.

There are no claims for foreign bodies.

Within the claims.

Particulars are 33 the rest are from the customer.

Administration is 0

3.11 Management of incidents, product withdrawal and product recall

The crisis management procedure PG_04 (Rev. 04, 11-10-2023) is implemented, describing possible courses of action in the following situations: fires, building collapses, chemical spills, natural disasters, supply shortages, staff absenteeism, service interruptions, internal disruption, data security issues, political unrest, product contamination and pandemics. The BCP Business Continuity Plan (Rev. 04, 01/09/21) is implemented.

The product recall procedure PC_12 (Rev. 07, 23-01-2024), inclusion of wallward in the recall trial, is also in place, describing the steps to be followed in a food crisis situation, as well as possible product recalls and/or withdrawals.

In Annex AI_PC_12 Contacts, the members of the Recall Committee are defined:

- General Manager
- National Key Account Manager
- Management Systems Director
- Lab Manager (Vilches)
- Lab Manager (Dos Hermanas)
- Plant Manager
- Export Manager
- National Commercial Manager
- Purchase Manager of Auxiliary Materials and services
- Operations Manager
- Quality Manager

The person to contact in case of crisis is José Manuel González García. Telephone: 669 675 310. E-mail: jmgonzalez@acesur.com.

The procedure includes a list of contact telephone numbers for Authorities (AESAN, Public Health Department), customers (Example. ALDI Australia: mark.bolton@aldi.com.au. Communicate within 60 minutes), the Certification Entity and logistics.

It is established that the certification body must be notified within a maximum of 3 working days in the event of product recall/withdrawal.

The product recall procedure is tested annually by carrying out 5 drills due to different customer requirements.

Annual drill report for customer ALDI (Australia) is checked. Date: 24-06-2024. Simulation: bad categorization is simulated. Product: 307655. REMANO EVOO 12 1305 boxes manufactured. Shipped. Start time: 19:35. End time: 20:25. Time taken: 50 hours.
The company declares that it has not had to carry out any withdrawal or recovery of product since the date of the previous audit.

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

4. Site standards

4.1 External standards

The factory is located in an industrial area, with no local activities that could affect the products. There are no potential polluting activities around the company, such as nearby factories, rivers, railway lines, etc.).

The size, location and overall construction are appropriate.

The workplace environment is observed to be well maintained. External areas are generally well maintained. (gardens, external asphalting, ...).

External areas are well drained to prevent water accumulation.

External areas are paved.

Internal audits and inspections include checks on external conditions.

4.2 Site security and food defence

It applies the Food Defence Procedure PG_16 (Rev. 2, 29/05/20), approved by José Manuel González García on 29/05/20.

Qualitative risk analysis is carried out according to Probability (P) and Severity (G):
Probability (P):
- High: Occurs at least once a month.
- Medium: Occurs at least once a semester.
- Low: Occurs at least once a year.
- Very Low: Does not occur at all.

Severity (G):
- High: Can cause serious illness or death.
- Medium: May cause minor harm or illness.
- Low: No harm or illness.

Different stages are identified: reception, refinery, unloading, packaging, storage, dispatch, transport, water tanks and plant safety. Signed by Francisco Álvarez (Quality Director) and Alfonso López (Industrial Director).

Document 01-07 FD service risk assessment under review. 4. OK

a value of 9 is a non-accepted hazard.

All hazards have been assessed as Low Risk; no special food defense measures are required. Existing preventive measures:

- Personal training in Food Defense

- 24 h CCTV surveillance camera

- Approved transporters

- Sealed loading unit

- Water analysis

- External fencing

- Closed entrance gate: Food Defense training given to the staff

Food Safety Plan R/PG_ 16/02 (Rev. 2, 28/06/18). Carried out by Ana María Álvarez on 24-05-2024. Vulnerabilities, solutions and corrective measures are established. External security, general internal security, process safety, storage security, security at delivery and reception points, water safety, security in the handling of correspondence, personnel security and security in new installations are checked.

The security control log checks the state of the perimeter, access doors and video cameras. Frequency: Quarterly. Example. Dates: 24-05-2024

Safety inspection record is checked. Frequency: Monthly. Example. Dates: 12-03-2024, 10-04-2024, 13-05-2024.

Food Defense Procedure PG_16 (Rev. 2, 29/05/20), approved by José Manuel González García on 24-05-2024, applies.

The food defense procedure is tested annually by means of a simulation exercise.

The food defense procedure is tested annually by means of a simulation exercise. INTRUSION DRILL WITH the new quality technician. access to the production area at the weekend via line 8 on 18-05-2024.

The vulnerability of the interior access to the production area is checked: Access to the production area from the main entrance. The plant Quality Technician accesses the production area from the entrance to the offices carrying a canister of a chemical product that has previously been filled with water but keeping the original label and identifying it with a yellow sticker on one of the sides to be deposited on one of the lines. The person checking the security cameras sees an object on the floor that should not be in that area so he notifies the Line Manager so that it can be removed immediately. Conclusions: The presence of the object is quickly detected on the security cameras. Factory staff have reacted by alerting their superiors to the presence of a foreign object. Compliant.

Activation of the second authentication factor.

Establish a system for regular monitoring of user accounts.

Increase drills and awareness campaigns on cybersecurity issues.

Staff receive annual Food Defense training, conducted on 19-21-2024.

The company declares that it has had no actual episode of malicious attack or entry into the plant since the date of the previous audit.

The site has RGSEAA: 16.00064/J for the following activities:

- Packaging – Oilseed oils.
- Packaging– Other vegetable oils and fats.
- Packaging– Olive oil.
- Specific activities– Refining of oils or oilseed oils.
- Specific activities–refining of olive oil.
- Import– olive oil.
- Import – oils of oilseed oils.

FDA registry available number 13622859374, valid until 31/12/24.

4.3 Layout, product flow and segregation

A plan of the facilities is available with the different zones designated according to the different levels of contamination risk. The following zones have been identified: LOW RISK and CLOSED PRODUCT. Plant layout plan date June 2022

The plant has different areas depending on its purpose: there is the production area itself for product packaging, this area is shared by the offices and changing rooms.

There is a finished product warehouse, a warehouse with a dispatch area and a warehouse for the storage of auxiliary products, in this same warehouse there is a reception area and an employee canteen. Annexed to the plant is the waste management area.

Before entering the facility, all visitors and personnel from subcontracted companies are informed of the hygiene regulations to be complied with inside the factory, and there is a personnel entry register.

No temporary structures have been observed.

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

In general terms, the construction, finishing and maintenance of the factory floors, walls and ceilings are adequate.

There are different areas of the factory that are regularly maintained, the concrete floors are kept in good condition. Any damage is repaired as a matter of priority. Metal ceilings are within the cleaning and disinfection plan and have no openings to the outside.

Concrete walls are easy to clean, free of damage and regularly maintained.

Windows communicating the factory with the outside are protected to prevent the entry of insects. External doors close tightly.

Lighting and ventilation in the production areas are adequate to facilitate the execution of work.

No puddles or accumulations of water have been observed, the drainage of the facilities is clean.

NC 4.4.8 During the visit to the auxiliary materials warehouse, it is detected that the rear access door does not close hermetically.

4.5 Utilities – water, ice, air and other gases

The organisation has a DRINKING WATER CONTROL PLAN document under review 6 dated 19-04-2024 which describes the origin of the water and the different analytical controls carried out. The last modification is a revision of the document.

All the water used in the factory for manufacturing and cleaning purposes comes from the municipal supply network and is potable. The water only comes into contact with the product during the refining process and cleaning work. The analytical controls in place are as follows:

- Daily CLR and organoleptic control (concluding turbidity). Values checked within limits. supervised in June and July 2024 by the health authority.

During the audit the following have been checked:

- Daily control of free residual Chlorine weekly and organoleptic analysis once a week. Sampling is carried out by rotating between the 27 sampling points identified in the water distribution plan. Turbidity, colour, odour, taste, pH, combined chlorine, free chlorine. The controls of June and July 2024 are reviewed. Chlorine between 0.25-0.8 ppm. Turbidity with turbidity meter. new

- Analysis bulletin carried out by LQM Report No. AB/MUR/13375/24 according to RD 3/2023, dated 07-05-2024. (Accredited by ENAC 498/LE2686) corresponding to the complete annual analysis with radioactivity (Control analysis, VOCS, microbiological, heavy metals, trichloromethane). It is detected that the trihalomethanes are out of limits and another analysis is ordered on 23-05-2024 with a negative result, carried out by LQM Report No. AB/MUR/13375/24 in accordance with RD 3/2023. Report No.: MY/MUR/18256/24

Updated water distribution diagram 09-2021.

In the HACCP, the following hazards have been identified in relation to the container blowing stage:

Chemical hazard. Oil and water from the compression system. Contamination of the container by oil and/or water from the air compression system. Filtration of the compressed air at the point of use with filters that retain these contaminants. Filters with 3 grades of filtration to comply with air quality according to ISO 8573-1 (Quality 1-2-1).

Physical hazard. Solid particles from the compression system. Contamination of the packaging by solid particles from the air compression system. Filtration of the compressed air at the point of use with filters that retain these contaminants. Filters with 3 grades of filtration to comply with air quality according to ISO 8573-1 (Quality 1-2-1).

Compressed air: air quality 1:2:1 according to SMC manufacturer.

Nitrogen data sheet. Revised.

Compressed air quality compressor maintenance is reviewed. The filters installed in the compressor and their technical data sheet are reviewed: AME 0.01, AMF, IDAF dew point and oil elimination.

An analysis of the compressed air is carried out according to the environmental surveillance register/ surfaces DATED 13-04-2021 REV 1 code R_PC_1001_77.

- Environment 21-03-2024 aerobic 2 and moulds 3. Limits less than or equal to 5. May line 6 same results

- Sample surfaces taken in pre-operational and operational. Lines 1,3,4,5,6,7 8 and drums, canteens, toilets, cellar, storage and refinery e.g: March (aerobes, moulds, enterobacteria, and listeria. All absent except aerobes 2) and May line 6. aerobes, moulds, enterobacteria, and listeria. All absent except aerobes

4.6 Equipment

The company has created a specific procedure ‘Acquisition and commissioning’, rev.3, 04.07.2023. It includes purchase of new equipment, movement of equipment, and management of mobile equipment.

Filler, blowers, labelling machines. All CE marked.

The company declares that no new equipment has been purchased since the last audit.

Cleaning and maintenance plan has been reviewed. In the procedure ‘Equipment management’ rev.4, 17.05.23, it is indicated that it has to be in suitable environmental conditions.

The equipment is constructed with the appropriate material which is stainless steel.

The design and location of the equipment allows for effective cleaning and maintenance. Production equipment in direct contact with the product is suitable for use in the food industry. Most direct product contact equipment is made of stainless steel.

Although there are conveyor belts and equipment hopper lids made of methacrylate, these are controlled with the brittle plastic register. For example, L-6

The pipes are made of stainless steel, the joints are properly finished and the pipes are differentiated according to the type of oil they carry, with no possibility of confusion or communication.

Out-of-use equipment is protected to prevent soiling.

4.7 Maintenance

It is managed with the procedure PG PGH 1001 03 Maintenance. REV 4 DE 05-07-2024 and verification of filters PC 1001 61, rev.6, 05.08.2020.

It is managed with an excell.

The maintenance actions are carried out by our own personnel and subcontracted companies.

Preventive maintenance is carried out during the technical shutdown of the line, so no production is involved. In the case of corrective maintenance, the process is controlled by the quality department. It covers all equipment

Preventive maintenance is reviewed for line 1 is packed and line 3 is boxed:

Week 12 of 2024. Multivias cleaning and verification of the electrical panel ok. Optical inspectors maintenance.

Perrier L1 blower week 17: check condition of hoses, dismantle turbine and check air filter and detect leaks every two months. Carried out in week 16.

Corniani L1-20 filler: monthly check condition of clamps and springs, carried out in week 17, grease lubrication points and check condition of sprockets, chains and tensioners.

Corniani capping machine: dismantle and clean the nail head. Check opening cones and replace if necessary. Week 17.

Corrective maintenance: They have a staff that they manage as they go out.

After corrective maintenance operations, there is an inspection by quality personnel at the end of the operation to check the correct state of cleanliness and order. As evidence of this inspection, the work delivery note is signed and stamped.

The location of the maintenance workshop does not compromise product safety.

No temporary repairs have been detected.

Used lubricants:

- Conveyor belt lubricant (P3-lubodrive AT) ECOLAB DRIEX R.2216370.

- Grease cartridge KRONES CELEROL L-7001 (ALIMENTRIA GREASE CARTRIDGE)

- KLUBEROIL 4 UH1-460N (LUBRICANT)

- Food grease

- (G-BESLUX CAPLEX M2 ATOX)

4.8 Staff facilities

Staff facilities are adequate. The number of changing rooms and lockers is sufficient for the number of workers. The location of the changing rooms allows direct access to the production areas without the need to pass through external areas. The lockers are double lockers allowing the storage of clothes and personal belongings separately from work clothes.

Toilets are separate and without direct access to the production, packaging and storage areas. Toilets have properly equipped hand washing facilities.

Smoking is not allowed on the premises. Only office staff eats in the canteen and food storage facilities are provided. There is no catering company

NC 4.8.4: During the site visit a hand washing point is detected where drying paper is missing (locker rooms)

During the visit to the facilities, a hand washing point was detected where drying paper is missing (changing rooms).

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

4.9.1 Chemical control

The plant facilities as well as the procedures implemented are adequate to prevent product contamination.

There is a list of dated chemical products (most of them are those used for cleaning) with their technical and safety data sheets, as well as instructions for use and dosage. This was verified during the visit to the spare parts store.

There is a procedure for spills. Environmental Technical Instruction IM 1001 02 rev 1.2 of 27-04-20218

Chemicals are stored in a safe place separate from production areas with access control.

4.9.2 Metal control

Company´s METALS POLICY PROCEDURE PC_11 rev 1 of 14-02-2020. which establishes that the use of cutters is only possible in areas with no risk of contamination and that only single-blade cutters (non-breakable) may be used.

Cutter deliveries to line managers and the correct condition of the cutters are also monitored.

Compliance with Good Handling Practices is monitored during inspections.

No staples, clips or tacks were detected at the time of the audit.

4.9.3 Glass, brittle plastic, ceramics and similar materials

The IT VERIFICATION OF CRYSTALS AND HARD PLASTICS pc 1001 53 rev 7 of 16-06-2023 is available and includes a list - scheme of brittle material for each of the packaging lines that is used to check the correct state of the same on a monthly basis.

In addition, there is a list for areas with the possibility of contamination (raw materials warehouse and refinery). All brittle materials present in the plant are checked on a monthly basis, where the cracks or fissures in the methacrylate are also monitored. e.g.: 31-05-2024, 28-06-2024, 30-04-2024

The glass windows are protected against breakage.

4.9.4 Products packed into glass or other brittle containers

The only packaging line that fills glass format is L8. PC_1001_48 ACTION TO BE TAKEN IN CASE OF GLASS BREAKAGE ON THE FILLING LINE is available in revision 10, dated 24-08-2023.

The risk zone has been defined as from the blower to the capping machine, as this is the route where the bottle does not have a cap. In the event of a breakage, the line is stopped, the area is cleaned, and all empty and full bottles are removed from the area where the breakage has occurred in order to discard them.

The risk zone has been defined as the area from the blow molder to the capping machine, as this is the area where the bottle has no cap. In the event of a breakage, the line is stopped, the area is cleaned, and all empty and full bottles are removed from the area where the breakage has occurred in order to discard them.

Once the area has been cleaned, personnel from the quality department go to the line to check the correct state of cleanliness and authorize the start-up. All breaks are recorded. The number of bottles to be removed in each case is indicated on the breakage report.

During the visit to the plant, we reviewed the records showing the breakages of bottles on line 8, as well as their cleaning, inspection and authorization by Quality to resume production.

The company states that it has not had any complaints about pieces of glass in the product.

NC 4.9.4.2 In relation to the management of glass, it is observed that the cleaning operators are not using the specific tools for breakage using red when it is defined as green.

4.9.5 Wood

The use of wooden elements in production areas is avoided. The only elements present are wooden pallets. The condition of wooden pallets is checked during monthly factory inspections.

4.9.6 Other physical contaminants

No misuse of pens or other tools that could constitute a hazard has been detected.

4.10 Foreign-body detection and removal equipment

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

HACCP includes risk assessment and the need to incorporate foreign body detectors. The following devices have been installed to minimize the risk of contamination by foreign bodies:

- Oil safety filters prior to packaging. Each line is fitted with a safety filter just prior to packaging (0.24 mm diameter) to retain any particles that may be present in the oil. The oil safety filters are checked weekly.

- Pre-packaging air turners/blowers. All filling lines are equipped with an air turner/blower to remove any particles that may be present in the container. All PET containers are blown in-line without intermediate storage. The correct functioning of the blowers is monitored as it is considered a CCP.

- The routes after blowing of containers are covered.

Considering the preventive measures outlined above, foreign body detectors have not been deemed necessary.

4.10.2 Filters and sieves

Various types of filtrations are carried out in the production process, such as, for example, the filtration of virgin olive oils to eliminate moisture and impurities or filtration after the decolourisation process. There is a procedure PC 1001 061 REV 7 DE 16-06-2023 describing how the filters are verified, including PXG risk analysis for 0.22 mm. These filters have been tested during the audit.

In each packaging line, there is a safety filter consisting of a stainless-steel mesh with a diameter of 0.24 mm and a bag filter. On a weekly basis (3-04-2024, 10-03-2024, 24-04-2024), all the safety filters are checked and a record of this inspection is kept.

If a foreign body is detected in the filter, it is noted in the observations field and, if necessary, its origin is investigated. The state of the oil and its density mean that the chosen oil is optimal; it has been proven that cold oils clog the filter.

There have been no complaints of foreign bodies.

4.10.3 Metal detectors and X-ray equipment

Non applicable

4.10.4 Magnets

Non applicable

4.10.5 Optical sorting equipment

Non applicable.

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

All packaging lines are equipped with container turner-blowers. This stage has been considered as a CCP. Thus:

CCP1: Container blowing stage: Physical Hazard due to contamination by foreign bodies or crystals: Low probability and high severity. Risk I therefore decision tree and finally PCC 1 (LCC 1: Blowing pressure above 1.5 bar and at L8 (glass line) above 3 bar). The blowers have an automatic stop system in case of lack of air pressure. The rest is checked initially and hourly by visual inspection of the pressure gauge. In addition, at the start of the shift, line personnel check the correct operation of the blower by introducing some elements into containers and checking their elimination.

The Maintenance Department carries out inspections of the blowing channels.

In the traceability exercise carried out, the monitoring records of this CCP have been reviewed.

The critical limits have been validated by means of empirical tests for the elimination of foreign bodies. In addition, on a monthly basis, validation tests are performed on each line by introducing certain foreign elements and checking their removal. The test reports of all packaging lines are reviewed. Record dated 26-03-2024.

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4.10.7 Other foreign-body detection and removal equipment

Non applicable.

4.11 Housekeeping and hygiene

General Hygiene Plan PGH_1001_02, rev.15, 21-03-2024

Cleaning is carried out by the company's own trained personnel. The person responsible for cleaning is the area manager who supervises the work. Personnel facilities (offices, changing rooms, etc.) are cleaned by an external company (EULEN).

The company has defined two degrees of dirt: in contact with the product (fillers and transport equipment) and the rest of the equipment; and two degrees of areas: clean and dirty. the product is considered low risk as it is always closed.

Cleaning utensils are available for each area, e.g., green for glass.

The cleaning chemicals are those suitable for the food industry (key 37). by The company has a list of the products used with dosages and instructions for use. ANNEX _POGH_1001_02. dated 28-11-2023. Shure clean plus 2019-02-04, degreasing detergent. CELEA GEL hand wash

The cleaning of tanks and closed circuits is carried out by dragging with oil. The tanks are cleaned annually with water only.

The register also includes a record of the cleaning of packaging tanks, the cleaning of packaging tanks in the outside cellar and a record of the cleaning of new tanks B R/pc 1001_08/05-01. The cleaning of tanks B-17, D30 and D15 is checked.

The cleaning verification is performed and recorded at the end of each cleaning operation.

The efficacy of the cleaning procedures is validated by microbiological surface analysis. In this way, fortnightly internal and annual external controls are carried out 'Environmental surveillance recording program CP_1001_77, under review 4 dated 14/6/2023. Cleaning tools available in every zone e.g: green for glass.

Annual external analysis: Surface analysis is also carried out. Limits: Mesophilic aerobes (0-10 cfu/cm2), Moulds and yeasts (0-1 cfu/cm2), Enterobacteria (0-1 cfu/cm2), Listeria (Absence).

Annual surface analysis carried out in an external laboratory AGROPAR ANÁLISIS Y SERVICIOS Ltd with satisfactory results.

Monthly analyses: In addition, internal surface analyses are carried out on a monthly basis. The state of cleanliness of the different packaging surfaces of the plant is analyzed by swabbing, rotating fillers and compressed air filters of different blowers.

In all records reviewed, the results are within the maximum limits established.

NC 4.11.1 During the visit to their facilities a lack of cleanliness was detected in:

a) the upper part of the tanks

b) the men's changing room toilets

NC 4.11.2

The current cleaning verification procedure does not guarantee that adequate levels of cleaning are achieved, e.g: small fragments of glass are detected on the floor of line 8 after the product is closed.

4.11.7 Cleaning in place (CIP)

Non-applicable.

4.11.8 Environmental monitoring

Environmental Monitoring Procedure CP_1001_77 (under review 4 dated 14/06/23) applied. The microbiological analysis carried out in oils is exceptional, bacteria or other pathogenic microorganisms cannot be multiplied in a product if it does not contain water, oils do not pose a health risk.
Depending on the risk of pathogens or spoilage organisms and the limited accessibility of the product only exposed at the time of filling, the facilities are classified as low risk level.

Sampling points: Sampling is carried out according to the risk approved, prioritizing the areas of their facilities where environmental contamination is reasonably likely to be greatest, at the bottle filler neck.

Limits have been established according to the criteria adapted by external laboratories that carry out the annual analyses, according to which they are indicators that allow the degree of cleanliness of the installation to be assessed and the reference values are established on the basis of bibliography and historical data. Limits: Mesophilic aerobes (≤ 5 cfu/cm2) moulds and yeasts (≤ 1 cfu/cm2).

Annual environmental analysis carried out in an external laboratory: AGROPAR ANÁLISIS Y SERVICIOS, Ltd dated: 15/05/2024. Petri dish. Parameters: Aerobes (cfu/cm2/h) and moulds (cfu/cm2/h). Samples: P1 (L1), P2 (L3), P5 (L6), P6 (L7), P3 (L4), P8 (drum line), P4 (L5), P (9) refinery and P (10) warehouse. Results: Aerobes (< 10 cfu/cm2/h) and moulds (< 10 cfu/cm2/h).

In addition, internal environmental analyses are carried out on a monthly basis. Sampling is carried out internally in the areas most susceptible to microbiological contamination with the line in operation. The plates are opened and left in the air for 10 minutes. Internal environmental analysis: aerobes and moulds, line 1 in February, line 3 in March, line 4 in April, among others. Result 1 (correct).

If the analysis gives values above the allowed limit, repeat the analysis. If it is still outside the values established, the area is monitored for 3 months. Finally, corrective measures based on cleaning are taken.

Surface analysis is also performed. Limits established: Mesophilic aerobes (0-10 cfu/cm2), Moulds and yeasts (0-1 cfu/cm2), Enterobacteriaceae (0-1 cfu/cm2), Listeria (Absent).

Annual surface analysis carried out in an external laboratory AGROPAR ANÁLISIS Y SERVICIOS,.Ltd dated 15/05/2024 Sterile swab. Parameters: Mesophilic aerobes (cfu/cm2), total number of Enterobacteriaceae (cfu/cm2) moulds and yeasts (cfu/cm2), listeria cfu /cm2 . Samples: there are 20 points: number 1 line 1 dirty, number 2 line 1 clean, number 3 line 3 dirty, number 4 line 3 clean, number 5 line 4 dirty, number 6 line 4 clean, number 7 line 5 dirty, number 8 line 5 clean, number 9 line 6 clean, number 10 line 6 dirty, number 11 dirty line 7, number 12 clean line 7, number 13 dirty line 8, number 14 clean line 8, number 15 dirty drum line, number 16 clean drum line, number 17 dirty hold, number 18 clean hold, number 19 dirty open, number 20 OP. All results are within the limits established.

In addition, internal surface analyses are carried out on a monthly basis. The state of cleanliness of the different packaging surfaces of the plant is analyzed by swabbing, rotating fillers and compressed air filters of different blowers.

An analysis of the compressed air is carried out:

Ambient 16.05.2023 aerobes (3-5 cfu/cm2) and moulds (0.5 cfu/cm2). result <0.1. lines 3,4,5,6,7,8, and drums.

Aerobic surfaces (0-10) Enterobacteriaceae (0-1) moulds and yeasts (0-1). all less than 1. sample taken in pre-operational and operational. Lines 3,4,5,6,7 8 and drums.

4.12 Waste and waste disposal

Waste is managed by authorised companies. The factory has an Environmental Management System in accordance with the UNE-EN ISO 14001:2015 standard and certified by AENOR.

The waste generated is assimilable to human waste, plastic, glass, paper, cardboard, sheeting and pallets,

Waste management is contracted to Gestor Integral SAICA AR/RGNP-761.

The date of the hazardous waste declaration is reviewed dated 29-02-2024.

The date of the hazardous waste declaration is reviewed dated 29-02-2024.

Waste removal documentation: SAICA e.g. with 8-07-2024 glass 5860 is removed.

Customer-marked labels are destroyed by the company and a record is kept. These labels are identified and located in a non-conforming area.

Containers are identified, easy to clean, well-kept and frequently emptied.

4.13 Management of surplus food and products for animal feed

The company declares that there has not been surplus product or by-products for animal feeding. In the case of non-compliant product or product close to expiry, it is reprocessed according to the defined flows. It goes to the refinery. In

some cases, the surplus product of the client's brand may be given to charity or non-profit associations, always with the client's approval. .

4.14 Pest management

PGH_1011_04 procedure under review 9 dated 06.09.2021.

Pest control is contracted with the company RENTOKIL (procedure registered in the Official Register of Establishments and Biocide Services of Andalusia No. 15-CM-ESR) which makes monthly visits to control the presence of rodents and flying and crawling insects. Contract No. 00030378, 2022.

- Monthly analysis: rodents and crawling insects. e.g. 21-06-2024, 20-05-2024, among others. There is no evidence of anomalies. In terms of crawling insects, the incidence has been low (September 2022) or nil.
- Quarterly analysis: flyers. The maintenance of the insect catchers is managed by RENTOKIL. 15-04-2024 AVO certificate is checked and the degree of superior technician in environmental health is checked.

We did not check during our visit to the plant the presence of pests in the warehouse.

The following registries were reviewed:

- Map of their premises with the inclusion of control elements dated September 2019. Placebo is used outdoors and pheromones indoors.

The GENERATIO PLA technical file is reviewed. ES/MR (NA) 2018-14-00019.

Training on pests has been given to plant personnel in refresher courses. The certificate of attendance of various operators is reviewed.

Trend analysis during management review, July 2024 (April to June 2024), with no incidents of note,

Annual in-depth study dated July 2023 JMGJ is checked

Insect cutter lifetime is 3 years or 1 year depending on the model used. Last annual change completed in December 2022 (2 insect catchers), the rest are due in 2024, as they were installed in December 2021.

Ana Álvarez and Lola Saeta are the pest managers of the plant. Both have received specific training from the external company Rentokil on 22.06.21, 3 h (A.A) and 08.07.21 3 h (L.S).

NC 4.14.7: During the visit to the refinery facilities, an anti-bird net was detected unhooked. Plans of facilities with control elements dated September 2019. Use of placebo outside and pheromones inside.

The technical file GENERATIO PLA. ES/MR (NA) 2018-14-00019 was reviewed.

Pest training has been given to plant personnel in refresher courses. Attendance certificates of various operators reviewed.

Trend analysis in management review, July 2024 (April to June 2024), with no incidents of note,

Annual in-depth study dated July 2023 JMGJ and checked.

Lifetime of insect cutters is 3 years or 1 year depending on type. Last annual change in December 2022 (2 insect catchers), the rest are due in 2024, as they were installed in December 2021.

Ana Álvarez and Lola Saeta are the pest managers of the plant. Both have received specific training from the external company Rentokil on 22.06.21, 3 h (A.A) and 08.07.21 3 h (L.S).

NC 4.14.7: During the visit to the refinery facilities, an anti-bird net was detected unhooked.

During a visit to the refinery facilities, a bird net was found hanging down

4.15 Storage facilities

The storage of raw, auxiliary materials and end products is adequate, depending on the type of product.

Raw materials and bulk end products are stored in stainless steel tanks, the design of which prevents contamination. The tanks are locked with padlocks.

The end products and auxiliary materials are stored in an automated warehouse, which ensures their proper rotation by means of SAP

There is a warehouse for auxiliary materials next to the plant access control. The packages are stored and protected along with their packaging, In the case of partially starting one, the rest of the material is packaged and identified for a later use.

The products do not require the control of temperature.

4.16 Dispatch and transport

Traceability is kept during shipment and transport, as all pallets and final products are identified with batch number identification attached.

The loading orders detail the product to be loaded, the destination (customer) and the transport vehicle.

The contracts signed also cover all requirements and have been signed by the different contractors.

Available agreements signed with transport companies. Company: Vivatrans, SKA, Carrera logistic.

The Hygiene condition of vehicles is being monitored. Conditions are inspected before loading the product. Criterion tanks: cleaning certificate, delivery note or document of the last 3 loads.

There is a documented transport control procedure which covers all requirements of the standard.

- The carriers have signed a letter of commitment from Aceites del Sur Coosur, Transporte boreal logistica slu driver Blas Martinez Fernandez, date of shipment 23-04-2024. (from Vilches to 2H) letter of commitment signed on 18 July 2024. Performance: 3 anomalies detected.

- Other means of transport: J carrion, letter of engagement (R/pgh_101_ 09/08 under review 3 dated 21-04-2023) Procedure signed on 16 May 2023.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.8.6	According to the current legislation, smoking is not allowed in work centers.
4.10.1.2	There is no evidence of foreign body detection equipment.
4.10.1.3	There is no evidence of foreign body detection equipment.
4.10.1.4	There is no evidence of foreign body detection equipment.
4.10.3	There is no evidence of metal detectors or x-ray equipment.
4.10.4	There is no evidence of magnets installed.
4.10.5	There is no evidence of optical sorting equipment.
4.11.7	CIP cleaning is not available.
4.13.3	There is no evidence of waste or subproducts generated and destined for animal feeding.
4.14.2	Pest control was hired out to an external company.
4.15.3	There is no evidence of product stored at a controlled temperature.
4.15.4	There is no evidence of product stored in a controlled atmosphere.
4.16.3	Products are stable at room temperature.

5. Product control

5.1 Product design/development

Regarding its content, the possibilities to alter the composition are only through the selection and blending of different types of oil.

PG 1001-04 under review 5 dated 07-10-2020

There is a new product development sheet R/PC 1001 04/02 under review 5 dated 05-10-2020.

The Development procedure includes the review of the HACCP when it is produced.

Product development is reviewed: WOK OILS (28-07-2020). The inputs were included. Customer: ALDI (refined sunflower oil, ginger essence and citronella essence).

The HACCP team is involved in the development of the product. This is reflected in the development format. In this case, it was the sales manager.

The organoleptic control sheet of the oils is reviewed, in this case wok citronella plus ginger (05-07-2024).
It goes to the prototype phase; it is sent to the client and the commercial gives the ok.
The client has sendt the technical data sheet of the product with guidelines for labels e.g:
The citronella and ginger scents are reviewed. DELSA 21798 Citronella flavor.

Product-shelflife and nutritional value study.
Two-year shelf-life study of traditional sunflower Coosol 15x1 l PET. EXPIRY DATE: .09-2021 lot number 06920M0657.
Nutritional value: MICROAL laboratory no. L

Shelf-life and nutritional value study.
Two-year shelf life of traditional Coosol sunflower 15x1 l PET. Expiry date:.09-2021 number lot 06920M0657.
Nutritional value: MICROAL laboratory No. L.

3-year shelf-life test of NATUREL, mild olive product from 18-04-2018 to 31-03-2021. There have been no customer complaints.

On the other hand, shelf-life studies have been carried out. Example: Product: 24-month shelf-life analysis, oil stability study dynamic parameters K and peroxide. Product packaged in December 2021, expiry date: February 2023. % acidity and peroxides

The validation of the nutritional value is carried out by means of a study of fatty acids by physical-chemical analysis during the audit It has been verified that the values are within the limits established. Analysis carried out in an accredited laboratory. I MICROAL ENAC No. 148/LE dated 10-10-2023. Analysis Number LAB/136361

5.2 Product labelling

The design and development process for new products includes the review and approval of labelling. In order to ensure that the information on the labelling complies with the legal requirements that are implemented.

During the audit, the labels of several products have been reviewed.

- La española 1 L olive oil. Mention of BBD. Nutritional value included: Code e, light flavour.

- 2l Olive oil Nature including tasting, halal seal and nutritional value.

- Refined sunflower oil 500 ml COOSOL brand. Maximum acidity: 0.2. High Vitamin E content. Your fried food absorbs 30% less oil than conventional sunflower oil (Study carried out by the University of Cordoba). Ingredients: Refined sunflower oil, antioxidant: natural extract rich in tocopherols (E-306) and anti-foaming agent E-900. Keep away from heat and excess light. e. Nutritional information is included.
- ALTIOLIVA 25 L. including nutritional value. Olive pomace oil, especially for frying
- Asia Green Garden (refined sunflower oil, ginger and citronella essence).500 ml ALDI, including nutritional value ingredients. Nutriescore, code e.

5.3 Management of allergens

Pc 1001 60 under review 5. Allergen control Plan.

The company has specifications or declarations of allergen presence provided by raw material suppliers, ingredients and additives.

Previously, there was a reference with omega 3 peanuts, sesame, etc. The company declares that the reference has been removed.

5.4 Product authenticity, claims and chain of custody

Last vulnerability study on 10-01-2024. These are carried out every six months. All raw materials are assessed as low risk except EVOO which is medium (see traceability exercise). Subcontracting is included.
The following factors are taken into account:

The following factors were taken into account:

- Fraud record
- Geopolitical considerativos
- Supply chain (different suppliers =3)
- Relationship with the supplier
- Quality Control: control established during all the receptions of AOVE
- Storage and traceability
- Calibration
- Hygiene and cleaning
- Human Resources
- Information given to the consumer
- Subcontracting process (cisterns subcontracted =)

Weekly consultation to the RASFF carried out by the Quality Technician.

Fraud Team= HACCP Team. Training given to the team, “FSPCA, intentional adulteration conducting- vulnerability assessments using key activity types”. 28.03.23.

The vulnerability analysis carried out in the different raw and auxiliary materials and corresponding to the traceability test was reviewed.

5.5 Product packaging

The following packaging materials were checked during the audit:

- Technical File: 1 l bottle square smooth RPET (30 g) under review 3 dated 29-03-2022. Declaration of conformity dated 29-03-2022
- Cap Technical File: EV 29/19 MAG (7745) under review 09-03-2016. Declaration of conformity dated 30-06-2022.
- Art labelling file: 410053 passed dated 27-01-2023, last review: (rev 2)
- 6x6 box file: it was approved on the 19-06-2023, 104307-1-1 draft
- Film supplier. 12BT 501 technical file UNDER REVIEW 4 dated 17-08-2021
- SP GROUP 800044976. data sheet APET H/PE EPEL 4-12-2020. declaration of conformity 4-02-2021.

5.6 Product inspection, on-site product testing and laboratory analysis

Analytical Plan under review.4 dated 05.06.2023.

Melamine in EVOO dep.11 Hojiblanca dated 26.11.21; date of analysis 01.08.22. Espejo Laboratory not accredited.

Product release. Analysis of EVOO batch E049 carried out by INDLAB and accredited by ENAC. Report No. A/202203200. Physical-chemical analysis complete.

Analysis carried out during the reception of product in bulk:

Analysis carried out during the reception of product in bulk:

Laboratory analysis bulletin no. CT/202408468 peroxide acidity, tasting moisture and organoleptic. Annex 1 I CP 1001_27_ internal input control plan is reviewed. Moisture, volatiles, delta K acidity and peroxides, tasting acids. This is sent to D17 warehouse (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3.

Laboratory analysis bulletin number 202408480: peroxide acidity, tasting moisture and organoleptic analysis. Annex 1 I CP 1001_27_ is reviewed. **Internal control plan during the reception of goods:** moisture, volatiles, delta K acidity and peroxides, tasting acids. It is sent to the D17 warehouse (external warehouse). Tasting fruity 4,5 bitter 3,0 spicy 3,3

Analytical bulletin. Nº 010000508228 dated 01-03-2024. Annex 1 I CP 1001_27 is reviewed. **_internal control plan during the reception of goods:** moisture, volatility, delta K and peroxide acidity, acid tasting.

Analytical Bulletin number 01000057998 dated 01-03-2024. Annex 1 I CP 1001_27_ was reviewed. **Internal control plan during the reception of goods:** moisture, volatility, delta K and peroxide acidity, acid tasting

MICROAL ENAC nutritional value, lab number 148/LE dated 10-10-2023. Analysis No. LAB/136361

BBD: 18-03-2026. 24-month shelflife analysis: oil stability study, dynamic parameters K and peroxide. Product packaged in December 2021. Product shelflife, February 2023. % acidity and peroxides

The following analyses are verified:

A/202300845 sample dated 24/01/23. Sample reference.: E23006. Product: Extra virgin olive oil (500 ml PET without packaging). Procedure carried out in an external INDLAB accredited laboratory (ENAC no. 1089/LE2141). Parameters: Profile of fatty acids, PAH, tocopherols, phenolic compounds, pyropheophytin and diacylglycerols.

Annual INDLAB ENAC metal laboratory. Correct. NO A/202401957.

MOHS and MOAHS, INDLAB ENAC laboratory Mohs and moahs . Correct. NO. A/202405638.

Half-yearly Glycidol 3mcpd: INDLAB ENAC laboratory Glycid esters, 2-MCPD AND 3-MCPD. Correct. NO. A/202401960.

Annual dioxins pcb: INDLAB ENAC laboratory Glycidal esters, 2-MCPD and 3-MCPD. Correct. NO. A/202401962.

Six-monthly melamine and cyromazine analysis. INDLAB ENAC laboratory Melamine. Correct. NO. A/202401963.

PHTHALATES: annual INDLAB ENAC and phthalates: Correct. Number A/202401961

Pesticides: INDLAB ENAC pesticides: OK, number A/202401956

Ciromycin laboratory INDLAB ENAC Ciromycin Correct. NO A/202403446

Analyses carried out in AOVE from b17 tank.

Annual surface analysis carried out in an external laboratory. AGROPAR ANÁLISIS Y SERVICIOS, Ltd. Date: 15/05/2024. Sterile swab. Parameters: Mesophilic aerobes (cfu/cm2), total of enterobacteria (cfu/cm2) moulds and yeasts (cfu/cm2), listeria cfu /cm2 . Samples: there are 20 points: number 1 line 1 dirty, number 2 line 1 clean, number 3 line 3 dirty, number 4 line 3 clean, number 5 line 4 dirty, number 6 line 4 clean, number 7 line 5 dirty, number 8 line 5 clean, number 9 line 6 clean, number 10 line 6 dirty, number 11 dirty line 7, number 12 clean line 7, number 13 dirty line 8, number 14 clean line 8, number 15 dirty drum line, number 16 clean drum line, number 17 dirty hold, number 18 clean hold, number 19 dirty open, number 20 OP. All results are within the limits established.

- Physical-chemical analysis of EVOO is external to B17 tank. INDLAB ENAC Laboratory Number. 1089/LE 2141. Lot 24020 and report No. a/202404732.
- Physical-chemical analysis of EVOO is external to the B17 tank. INDLAB ENAC Laboratory Number 1089/LE 2141. Batch 24020 Y Report Number a/202404205

Intercomparative analysis with annual frequency established. Product: EXTRA VIRGIN olive oil date: 13-06-2024. Organiser: AXIO. Participants: 24. Parameters: different parameters e.g. K232 Z SCORE -065. STIGMASTENOL 0,67

Intercomparison with annual frequency. Product: Olive oil. Date: 15-04-2024. Organiser: PT GSC is accredited by enac Participants: 24. Parameters: different parameters e.g. total acidity 0,83,

Laboratories accredited by ENAC: INDLAB, TELLO.

5.7 Product release

The blocking and release of the non-conforming packaged product is computerized in the automatic finished product warehouse. There is no evidence of product is released until the corresponding analysis plan has been

completed. e.g. physical-chemical analysis of EVOO is external to the B17 warehouse. INDLAB ENAC Laboratory No. 1089/LE 2141. Lot 24020 and Report No. a/202404732.
5.8 Pet food and animal feed
Non-applicable.
5.9 Animal primary conversion
Non-applicable.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.2.5	There is no evidence of cooking instructions during product labelling.
5.6.2.1	According to product characteristics, there is no evidence of pathogen analyses carried out.
5.8	There is no evidence PET FOOD made.

6. Process control
6.1 Control of operations
Process specification documents and work instructions are available at key production processes to ensure its safety, legality and quality of the products. Procedure available in key production processes to ensure the safety, legality and quality of products. All operations that need to be monitored during product processing are properly recorded. Ongoing monitoring devices are connected to an alarm system. In case of any equipment failure, the responsible persons would assess the conformity of the manufactured product during the failure. In case of process deviations, corrective actions are defined and implemented.

At each work station, there are the necessary specifications to control the processes.

Before starting the packaging of a product as well as during the packaging process, inspections are carried out on the material and machinery to be used.

Processes and equipment are usually produced and on the basis of what has been sampled during the audit. The safe, legal and quality products are in accordance with the HACCP plan.

The CPs and critical limits have been validated and transferred to daily production controls.

Processes are controlled for foreign bodies to ensure that products comply with specifications.

- In-house lab analyses are reviewed. Hydrocarbons and residues. chemical characteristics, fatty acids, purity and residues.
- Records of the production report: this action is repeated for all productions made
- Pre-operational inspection
- Breakage of glass containers
- Control established to check pressure during the blowing of containers with a 6 value.
- Control established to check the condition of the filter installed in the filling machine. OK

Storage conditions are adequately controlled.

There are on-line inspections to ensure that labelling and expiry dates are properly printed and assigned for all products. Evidence is left on the various parts e.g. by attaching one of the labels The company has demonstrated an effective control of all operations. The company is carrying out procedures to verify that the processes and equipment employed are capable of producing safe and legal products consistently with the quality characteristics demanded.

The oil change process has been validated. A change table has been created where all possible changes and the differentiating parameter of the last packaged product are listed. 110.08.2021, last modification: 14.11.2021. Example: from seed to olive. Parameters to be controlled: acidity, color, delta cen42 <0.3; From refined olive to extra virgin olive. Parameters to be checked: color, acidity, stagmastadiene <0.05.

6.2 Labelling and pack control

It was found that there is a formal process of allocating packaging materials to the different lines before the start of the production scheduled. There is a label warehouse from which the correct label is managed and allocated to packaging. This in turn collects the labels left over from production. In this label warehouse there is an area for non-conforming labels.

By means of a daily production record per line, a series of checks are made before the start of the activity and during product changes. If there are leftovers of other oils, these are disposed according to a cross table of carry-overs to be checked on the individual lines, the labelling check records as well as the printing controls, e.g. the batches on the labels of the products on the line have barcode readers which are checked during the production process.

The operation to change the product reference on bottling line 5 on 16-07-2024 was checked in situ: Bottling and labelling of seed oil to sunflower oil 5 liter COOSOL ultra frying sunflower oil (analysis PT/202408509). The correct execution of the change was checked, which include:

- Change of label and back label.

- Change of carton (12 x 500 ml to 6 x 500 ml).

- Change of batch coding on back label and cardboard box.

- Change of cap (color).

- Change of bottle (color).

It has been verified that there is a formal procedure for assigning packaging materials to the different lines before starting the productions scheduled. Auxiliary materials from previous productions are removed from the production lines. There is a label warehouse from which the correct labels are managed and assigned to packaging.

Click or tap here to enter text.

6.3 Quantity, weight, volume and number control

The company has scales for an adequate control of the content. The staff of the production department periodically takes containers from the packaging line and weighs them on the scales. This equipment is equipped with data collection and processing software. The sampling and approval/rejection criteria are in accordance with the legal provisions in force.

An instruction for the frequency and methodology of the verification of the net contents is established and complies with the legislation in force. CP 1001 58. Under review 5 dated 16-06-2023

These verifications are carried out throughout production and are recorded in one of the parts. Actual content report. As for example: line 8 O LIGHT ESPAÑOLA In situ (x:1004.6 with x % 1004.6 with a minimum value of 1001.0 and a maximum value of 1000.7). Line 5: effective content control (change). Coosol seeds 308733. Olive 0,4 REMANO, 15x1.

The effective content control is in accordance with the applicable legal regulations and meets the customer's specifications.

Industrial or semi-bulk formats (e.g. 200-litre drums) are packaged on a loading chart and the contents are checked in 100 % of the containers.

On-line controls of the products present in the plant and those of the traceability test that were reviewed.

6.4 Calibration and control of measuring and monitoring devices

CP_03 Equipment Management Procedure applied (under review 3 dated 19/04/21).

There are 7 pressure gauges in the container blowing machines and 5 effective content control scales: weights, platform scale, torque meter.

The metrological confirmation of the following equipment is checked:

L1 Pressure Gauge

The pressure gauges are renewed annually. L1 Pressure gauge. Serial number: n 15093200. Calibration certificate no. 37520. Date: 20-02-2024. Procedure carried out by MANOMETRY AND INSTRUMENTATION. Calibration range: 0-10 bar. Use of a standard pressure gauge. Procedure signed on the 13/03/23 at 10:10.

L1 Scale

With regard to the effective content of control scales, they are subject to an annual external calibration and biennial metrological verification. L1 scale. METTLER TOLEDO scale. Serial Number: b906214087. Annual external calibration carried out by METTLER TOLEDO (ENAC nº 61/LC10.038). Certificate No.: ES0479-019-121323-ACC-ES. Date: 13-12-2023. Calibration range: 0-3 kg.

Non-automatic weighing instrument and verification certificate. Procedure carried out by INGEIN (ENAC nº 81/EI622). Certificate nº V291_01698_24. METTLER TOLEDO scale. Model: ICS685S. Serial No.: B906214087. Verification date: 19-02-2024 Verification result: OK. Certification validity: 18-02-2026

High tonnage scale

High tonnage scale. Biennial metrological verification. COMYSER. Model: BP6EM016X003. Serial Number: 11031. Non-automatic weighing instrument, certificate verified. Procedure carried out by INGEIN. Certificate nº V2156MBJ0032. Verification date: 11-07-2023. Verification result: OK. Verification validity: JUNE 2025

List of RPC_03.1 lab equipment.

Agilent (C6)

C6. Agilent. Serial Number CN17023080. (Benzopyrene Analysis Equipment). External Annual Calibration carried out by AGILENT TECHNOLOGIES dated 12-03-2024. Procedure signed by the Responsible for Contaminants (Ana Márquez) and PCQI. Work Order: 6006449583

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

7. Personnel

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

All relevant staff, including the external one must receive adequate training prior to taking up their duties. On the other side, the on-site staff are under the supervision of the on-site staff.

The training plan designed for the inter-audit period has been reviewed and includes the courses that have been or are to be given so the staff would acquire the necessary competence after completion of a course. A test is carried out to check the efficacy of the training given.

All courses have been conducted in a language suitable for the operators with the inclusion of food handling training. There has also been a section of the courses dealing with labelling.

In relation to food safety culture, it was found through staff interviews that the level of understanding was not fully satisfactory.

HR sends a specific training plan to detect their needs. Procedure to be filled in and then sent to a general plan. Training record R.PGH_1001_05.01 (under review 3, dated 07/07/20).

The quality manager draws up the annual training plan for the 2024 oil packaging plant. Training given on labelling

- Pest training. Review of the PowerPoint. Pest control training plan
- food defense training.

Pest training. C+D, HACCP, GLASS, control of fraud, food defense control, Halal protocol, kosher protocol, critical point control. This 4-hour course is given to all the plant staff. Procedure delivered by the quality manager e.g: Daniel Gil from line 4. HACCP plan, Santiago Martinez

According to the training needs detected, an annual training plan was drawn up.

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

Hygiene requirements and good handling practices are documented in PGH 6 GOOD HANDLING PRACTICES UNDER REVIEW 10. Inclusion of risk analysis for wearing a cap. All aspects included in the Protocol were reviewed.

Hygiene requirements and good handling practices have been given to the staff and explained during the different training sessions scheduled. The ETT staff was included.
On a daily basis and during the control rounds agreed, the staff of the Quality Department has supervised the good practices approved.
In addition, monthly factory inspections are carried out to verify its compliance with good practices implemented by the staff. The chapter regarding auditing has been reviewed.

Hand-washing facilities at the entry of the production areas. Instructions available with the obligation to wash hands an adequate frequency established.

The company has blue metal detectable plasters. During the visit to the facilities, it was possible to verify the correct use of the blue plasters. There is no evidence of workers with scratches or cuts.

The access to the production areas with their own medicines is not allowed. During the interviews held, it is well established with the plant personnel that they know the good practices approved in relation to medicines. It is stated in the policy. Their own medicines can only be taken in the canteen.

Hand washing posters have been designed to explain how to proceed. The personnel disinfect their hands when entering the production areas. IC 1001 44 hand washing sanitization.

Protective clothing is washed by the operators in their own homes because. The idea is to protect them and not the product.

Hygiene level is high, the staff is aware of the rule and BPM was applied.

7.3 Medical screening

Hygiene practices include the obligation on behalf of the operators to report about any diseases the staff is suffering from or have come into contact with.

ACESUR has carried out a medical examination of the operators (health surveillance) and subsequently has issued a certificate of fitness e.g.: the workers of ETT RMM and the quality management technician LS are checked.

When entering the premises, visitors and subcontractors are asked whether they suffer or have recently suffered from any infectious or contagious diseases.

Personnel, visitors and subcontractors who suffer from or have been in contact with infectious diseases are not allowed access to the production areas.

7.4 Protective clothing: employees or visitors to production areas

Instructions for the use of protective clothing are included in the hygiene practices.

Operators are provided with adequate protective clothing in sufficient amount (summer and winter uniforms); the design of the clothing is considered adequate; there are no external pockets above the waist and no sewn-on buttons. The use of headgear by the plant personnel is adequate.

Beard masks are available, one of which has been given to the author.

Protective clothing is washed by each operator at home. They are informed by CP_1001_62, under review 6 dated 06.05.2022. A risk analysis has been carried out. A weekly check is carried out during the visit and the staff is interviewed and knows how the laundry has to be washed.

There is no evidence of high-risk or special care areas identified.

Gloves are in good condition. The technical instruction of GOOD HANDLING PRACTICES includes the regular change of gloves.

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

8. Production risk zones – high risk, high care and ambient high care production risk zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Equipment and maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

9. Requirements for traded products
9.1 The food safety plan - HACCP
Not applicable
9.2 Approval and performance monitoring of manufacturers/packers of traded food products
Not applicable
9.3 Specifications
Not applicable
9.4 Product inspection and laboratory testing
Not applicable
9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

Module 11: Meat Supply Chain Assurance	
Scope	Click or tap here to enter text.
11.1 Traceability	
Click or tap here to enter text.	

11.2 Approval of meat supply chain
Click or tap here to enter text.
11.3 Raw material receipt and inspection
Click or tap here to enter text.
11.4 Management of cross-contamination between species
Click or tap here to enter text.
11.5 Product testing
Click or tap here to enter text.
11.6 Training
Click or tap here to enter text.

Module 13: Meeting FSMA Requirements for Food – July 2022
Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)
Click or tap here to enter text.
Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)
Click or tap here to enter text.
Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)
Click or tap here to enter text.
Sanitary Transportation: 21 CFR Part 1 Subpart 0 (Clauses 13.4.1 – 13.4.9)
Click or tap here to enter text.
Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

Click or tap here to enter text.

14.1 Additional Specifier Requirements
14.1 Traceability
Click or tap here to enter text.
14.2 Environmental Monitoring
Click or tap here to enter text.
14.3 Product inspection and laboratory testing
Click or tap here to enter text.
14.4 Protective clothing: Employees or visitors to production areas
Click or tap here to enter text.

LABORATORIO DE ENSAYO FÍSICO-QUÍMICOS
RECONOCIDO POR EL COI PARA EL PERIODO
1 de DICIEMBRE de 2023 al 30 de NOVIEMBRE de 2024

LABORATORIO TELLO
A Tentamus Company

ENAC
ENSAYO
ISO 17025
Nº749 / LE1295

Los ensayos marcados con (*) no están amparados por la acreditación de ENAC. Las actividades marcadas con (#) no están amparadas por la acreditación de ENAC.

CLIENTE:

EXPLOTACIONES JAME S.L.
CORTIJO VILLACONCHITA
23630 VILLARGORDO
JAEN

INFORME DE ENSAYO

Informe de Ensayo (1): **41030172901 / M5/E**
Ref. Laboratorio: 1/2.496
Fecha de Recepción: 30/10/2024 **Fecha Fin Análisis:** 30/10/2024 **Fecha de Emisión:** 30/10/2024
Matriz a Ensayar: Aceites de Oliva

Envase: BOTE PET 100ml TAPÓN PRECINTO BLANCO **Cantidad:** 100ml

DATOS APORTADOS POR EL CLIENTE (2)

#Ref. Muestra: BF008

RESULTADOS DEL ANÁLISIS

Determinación	Resultado	Unidad	Límites	Procedimiento
Grado de acidez				
Acidez	**0.19**	% (ac.oleic.)	≤ 0.8 (Nota 1)	PNT 1.08
Indice de Peróxidos				
Indice de peróxidos	**3.2**	meq O2/kg	≤ 20 (Nota 1)	PNT 1.09
Prueba espectrofotométrica				
K 270	**0.15**	-	≤ 0.22 (Nota 1)	PNT 1.10
K 232	**1.59**	-	≤ 2.50 (Nota 1)	PNT 1.10
ΔK	**<0.01**	-	≤ 0.01 (Nota 1)	PNT 1.10
***Ésteres etílicos**				
* Ésteres etílicos	**<10**	mg/kg	Máx 35 (Nota 1)	PNT 1.69

Multirresiduos (GC-MS/MS)

Procedimiento: PNT 1.13 **Unidad:** mg/kg

Determinación	Resultado	Determinación	Resultado	Determinación	Resultado
* 2,4-Metoxicloro	<0.010	2-Fenilfenol	<0.010	Acetocloro	<0.010
Acrinatrina	<0.010	Alacloro	<0.010	* Aldrin	<0.010
* Ametrina	<0.010	Antraquinona	<0.010	Atrazina	<0.010
* Azinfos-etilo	<0.010	* Azinfos-metilo	<0.010	Azoxistrobina	<0.010
Benalaxil	<0.010	* Bendiocarb	<0.010	Benfluralina	<0.010
* Bifenilo	<0.010	* Bifenox	<0.010	Bifentrina	<0.010
Boscalida	<0.010	* Bromacilo	<0.010	Bromfenvinfos-etilo	<0.010
Bromfenvinfos-metilo	<0.010	Bromofos-etilo	<0.010	Bromofos-metilo	<0.010
Bromopropilato	<0.010	Bupirimato	<0.010	Buprofecina	<0.010
* Carbaril	<0.010	Carbofenotion	<0.010	* Carbofurano (No Sum)	<0.010

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CLIENTE:

EXPLOTACIONES JAME S.L.
CORTIJO VILLACONCHITA
23630 VILLARGORDO
JAEN

INFORME DE ENSAYO

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Matriz a Ensayar: Aceites de Oliva

RESULTADOS DEL ANÁLISIS

Multirresiduos (GC-MS/MS)

Procedimiento: PNT 1.13 **Unidad:** mg/kg

Determinación	Resultado	Determinación	Resultado	Determinación	Resultado
Carfentrazona-etilo (No Sum)	<0.010	Ciflutrin (suma isomeros)	<0.010	Cihalofop-butilo	<0.010
Cipermetrina (suma isomeros)	<0.010	* Ciproconazol	<0.010	Ciprodinilo	<0.010
Clomazona	<0.010	Clorantraniliprole	<0.010	Clorbensida	<0.010
Clordano (cis+trans)	<0.015	Clordano cis	<0.010	Clordano trans	<0.010
Clorfenapir	<0.010	Clorfenvinfos	<0.010	* Clornitrofeno	<0.010
Clorobenzilato	<0.010	Clorofenson	<0.010	Cloroneb	<0.010
* Clorotalonil	<0.010	Clorpirifos	<0.010	Clorpirifos-metilo	<0.010
Clorprofam	<0.010	Clortal-dimetilo	<0.010	Clortiofos	<0.010
* Clozolinato	<0.010	Cresoxim-metilo	<0.010	* Crotoxyfos	<0.010
Cumafos	<0.010	Deltametrina	<0.010	Dialato	<0.010
Diazinon	<0.010	* Diclobenilo	<0.010	Diclofluanida	<0.010
Dicloran	<0.010	Diclorobenzofenona, 4,4`-	<0.010	* Diclorvos	<0.010
Dieldrin	<0.010	Dietofencarb	<0.010	Difenamida	<0.010
Difenilamina	<0.010	Difenoconazol	<0.010	Diflufenican	<0.010
Dimetacloro	<0.010	Dimetenamida	<0.010	* Dimetoato	<0.010
* Disulfoton (No Sum)	<0.010	* Diuron	<0.010	Edifenfos	<0.010
Endosulfan (alfa+beta+sulfato)	<0.020	Endosulfan alfa	<0.010	Endosulfan beta	<0.010
Endosulfan sulfato	<0.010	Endrin	<0.010	* Endrin cetona	<0.010
EPN	<0.010	Etalfluralina	<0.010	Etilan	<0.010
				1,1-dicloro-2,2-bis(4-etilfenil)etano	
Etion	<0.010	* Etofenprox	<0.010	Etofumesato (No Sum)	<0.010
Etoxazol	<0.010	* Etridiazol	<0.010	Etrimfos	<0.010
Fenamidona	<0.010	* Fenamifos (No Sum)	<0.010	Fenarimol	<0.010
* Fenazaquin	<0.010	Fenclorfos (No Sum)	<0.010	Fenitrotion	<0.010
Fenotrina	<0.010	Fenpropatrin	<0.010	Fenson	<0.010
Fention (No Sum)	<0.010	Fentoato	<0.010	Fenvalerato	<0.010
Fipronil (No Sum)	<0.010	Fluacifop-butilo (No Sum)	<0.010	Flucitrinato	<0.010

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Matriz a Ensayar: Aceites de Oliva

RESULTADOS DEL ANÁLISIS

Multirresiduos (GC-MS/MS)

Procedimiento: PNT 1.13 **Unidad:** mg/kg

Determinación	Resultado	Determinación	Resultado	Determinación	Resultado
Flucloralina	<0.010	Fludioxonil	<0.010	Flumioxazina	<0.010
Fluopicolida	<0.010	* Fluorodifeno	<0.010	Fluquinconazole	<0.010
Fluridona	<0.010	Flusilazol	<0.010	Fluvalinato-Tau	<0.010
* Folpet (+Folpet deg.)	<0.010	Fonofos	<0.010	Forato (No Sum)	<0.010
* Formotion	<0.010	Fosalon	<0.010	Fosmet	<0.010
* Genite	<0.010	Haloxifop-etotilo	<0.010	Haloxifop-metilo (incl.H.p-metil)	<0.010
* HCH (alfa+beta+delta)	<0.020	HCH alfa	<0.010	* HCH beta	<0.010
HCH delta	<0.010	Heptacloro	<0.010	Heptacloro (+heptacloro epóx.)	<0.015
Heptacloro epóxido	<0.010	Heptenofos	<0.010	* Hexaclorobenceno	<0.010
* Hexazinona	<0.010	* Indanofan	<0.010	* Indoxacarb	<0.010
Iodofenfos	<0.010	* Iprodiona	<0.010	Isazofos	<0.010
* Isodrin	<0.010	Isofenfos	<0.010	Isofenfos-metilo	<0.010
Isopropalina	<0.010	Lambda-Cihalotrina	<0.010	* Lenacilo	<0.010
Leptofos	<0.010	* Lindano (HCH-g)	<0.010	* Linuron	<0.010
Malation (No Sum)	<0.010	Mefenpir-dietilo	<0.010	Metacrifos	<0.010
Metazacloro (No Sum)	<0.010	Metidation	<0.010	Metolacloro (No Sum)	<0.010
* Metoxicloro	<0.010	Metrafenona	<0.010	Metribuzina	<0.010
* Mevinfos	<0.010	Miclobutanilo	<0.010	* Nitralina	<0.010
Nitrofeno	<0.010	* Nonaclor (cis+trans)	<0.015	* Nonaclor cis	<0.010
* Nonaclor trans	<0.010	Norflurazon	<0.010	Nuarimol	<0.010
o,p´-DDD	<0.010	o,p´-DDE	<0.010	* o,p´-DDT	<0.010
Oxadiazon	<0.010	* Oxadixil	<0.010	Oxifluorfen	<0.010
* p,p´-DDD	<0.010	* p,p´-DDE	<0.010	* p,p´-DDT	<0.010
Paclobutrazol	<0.010	Paration-etilo	<0.010	Paration-metilo (No Sum)	<0.010
Pebulato	<0.010	Penconazol	<0.010	Pendimetalina	<0.010
Pentacloroanilina	<0.010	* Pentacloroanisol	<0.010	* Pentaclorobenceno	<0.010
Pentaclorobenzonitrilo	<0.010	* Pentaclorotioanisol	<0.010	Permetrin (cis+trans)	<0.015
Permetrin cis	<0.010	Permetrin trans	<0.010	Piperonilbutoxido	<0.010
Piraclofos	<0.010	* Piraclostrobina	<0.010	Piraflufen-etilo (No Sum)	<0.010

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Matriz a Ensayar: Aceites de Oliva

RESULTADOS DEL ANÁLISIS

Multirresiduos (GC-MS/MS)

Procedimiento: PNT 1.13 **Unidad:** mg/kg

Determinación	Resultado	Determinación	Resultado	Determinación	Resultado
Pirazofos	<0.010	Piridaben	<0.010	Piridafention	<0.010
Pirifenox	<0.010	Pirimetanil	<0.010	Pirimicarb	<0.010
Pirimifos-etilo	<0.010	Pirimifos-metilo	<0.010	Piriproxifen	<0.010
Pretilacloro	<0.010	Procimidona	<0.010	* Procloraz	<0.010
Prodiamina	<0.010	Profenofos	<0.010	Profluralina	<0.010
Prometrina	<0.010	Propacloro (No Sum)	<0.010	Propanil	<0.010
Propargita	<0.010	Propiconazol	<0.010	Propisocloro	<0.010
Propizamida	<0.010	* Prosulfocarb	<0.010	Protiofos	<0.010
Quinalfos	<0.010	Quinoxifen	<0.010	Quintoceno	<0.010
Quintoceno (+pentacloroanilina)	<0.015	* Resmetrina	<0.010	Simazina	<0.010
Sulfotep	<0.010	Sulprofos	<0.010	* Tebuconazole	<0.010
Tebufenpirad	<0.010	Tecnaceno	<0.010	Teflutrin	<0.010
* Terbacilo	<0.010	Terbufos	<0.010	* Terbumeton	<0.010
Terbutilazina	<0.010	Terbutrin	<0.010	Tetracloroanilina, 2,3,5,6-	<0.010
Tetraclorvinfos	<0.010	Tetraconazol	<0.010	Tetradifon	<0.010
* Tetrametrin	<0.010	Tolclofos-metilo	<0.010	Tolilfluanida (No Sum)	<0.010
Transflutrin	<0.010	Triadimefon	<0.010	* Triadimenol	<0.010
Trialato	<0.010	Triazofos	<0.010	* Tridifano	<0.010
Trietazina	<0.010	Trifloxistrobina	<0.010	Trifluralina	<0.010
Vinclozolina	<0.010				

NOTAS:
 # Los resultados expresados como suma se han calculado previamente al redondeo de decimales de cada uno de los resultados individuales también informados.
 # LC: límite de cuantificación. PNT: Procedimiento Normalizado de Trabajo.
 # La incertidumbre calculada (U), en parámetros fisicoquímicos, es para un nivel de confianza del 95% (k=2), expresada en valor absoluto.
 # Los resultados de métodos analíticos que incluyen fase de extracción no han sido corregidos porque los factores de recuperación están comprendidos entre el 95%-105%.

 # Los valores de los límites expresados son para la categoría: Aceite de Oliva Virgen Extra

Observaciones:

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RESULTADOS DEL ANÁLISIS

Nota 1: Límites indicados en el Reglamento Delegado (UE) 2023/731.
Se indican los Límites Máximos de residuos para Aceitunas para aceite (Reg.UE 396/2005 y post mod). Según Reg.Ejecución (UE) 2022/741, para calcular el LMR en aceite de oliva se multiplicará por el factor de transformación del aceite establecido en cada estado Miembro.
Los plaguicidas indicados con "(No Sum)" no incluyen la definición completa de residuo de plaguicidas de la UE.

Vº Bº Jefe de Laboratorio

Fdo: Mª Luisa Cuenca de los Cobos

Documento firmado y certificado electrónicamente por:
Laboratorio Juan Antonio Tello SL. CIF:B23603988

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Graza Updated Testing Requirements

Internal Food Safety Standard
11 December 2024

In addition to the current testing Graza performs on each lot of oil, Graza will add the following lab tests:

- Natural Toxins (nyco/alatoxins)
- Heavy Metals
- Pesticides

This testing will take place before oil is purchased and transported to any of our facilities for bottling.

Supply Chain Process related to testing olive oil is outlined here:

1. Graza selects oil from multiple farm partners.
2. Graza tests oil at an independent lab and approves testing before oil is paid for or picked up from farm partners. Once oil is approved, oil can be transported to bottling facilities.
3. Each facility also tests oil when it arrives to ensure it has not been tampered with or changed in the process of transport.
4. Oil is lot controlled from oil pick up through transport, storage, bottling and sale of final product.

SPOT GLOSS | PMS 4224 | PMS YELLOW 012

120 mm

MADE FROM OLIVES

Olive Pomace Oil & E.V.O.O.

Meet your high heat kitchen hero: Made from high quality olive pomace, aka the tasty tapenade created by the first cold press of Extra Virgin Olive Oil. We add back some E.V.O.O. for an antioxidant boost!

Naturally Refined (No Chemicals!)

Just a little bit of heat and pressure are applied to remove all impurities — this gives "Frizzle" its neutral flavor and high smoke point.

NEUTRAL FLAVOR

The end result is a buttery, neutral oil that can be used for all your high heat adventures: cooking, grilling, frying, and baking.

GRAZA.CO · @GETGRAZA

NEUTRAL VALUE SIZE

"Frizzle" High Heat Cooking Oil

A glorious mix of Olive Pomace Oil (olive mush) and our E.V.O.O. Use "Frizzle" as a neutral oil for all your high heat cooking, baking, and frying.

GRAZA®

67.6 FL. OZ. (2.11 QT) (2L)

Use me for:

Your screaming hot cast iron!

Cooking a vegetable tempura

Turning potatoes into golden, salty fries

Crisping up tofu on the stove

Baking the perfect chocolate chip cookies

Deep-frying chicken drumsticks

Pan-searing steak in a cast-iron

Making mozz sticks (yum!)

Nutrition Facts

about 130 servings per container
Serv. size: 1Tbsp (15mL)

Amount per serving
Calories 120

	% DV*
Total Fat 14g	**18%**
Saturated Fat 2g	**10%**
Sodium 0mg	**0%**
Total Carbohydrate 0g	**0%**
Protein 0g	**0%**

The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: OLIVE POMACE OIL, EXTRA VIRGIN OLIVE OIL
PRODUCT OF SPAIN.
DISTRIBUTED BY: DRUPELY INC, 185 WYTHE AVE, 2ND FLOOR BROOKLYN NY 11249
STORAGE: STORE IN A COOL, DRY PLACE, AWAY FROM DIRECT LIGHT.

Value Size

NON GMO Project VERIFIED nongmoproject.org

8 50062 39305 9

295 mm

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

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

SPOT GLOSS

PMS 4224

PMS 382

120 mm

"COOKING OIL"

Harvested in December

Olives are picked during peak harvest season when they're more mature and a bit juicier.

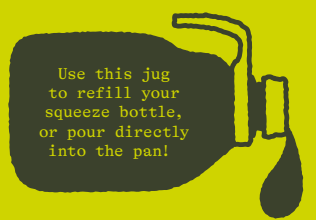
13lbs olives = 1 liter of oil

When pressed, these more mature, juicier olives yield a lot more oil.

Mellow taste

Take it easy

Just like (most) humans, olives get more chill with age. The oil produced from these olives is milder in flavor and makes for a more flexible cooking oil.



GRAZA.CO · @GETGRAZA

MELLOW "Sizzle" VALUE SIZE

Extra Virgin Olive Oil

No blending, no funny business. Just 100% pure Picual olive oil from Jaen, Spain.

GRAZA®

67.6 FL. OZ.
(2.11 QT)
(2L)

Use me for:

Roasting veggies on a sheet pan

Making eggs in the morning

Firing up a juicy steak on the grill

Or mushrooms, if you're into that

Baking a beautiful olive oil cake

Squeezing right into a super hot pan

Roasting a whole fish

Cooking fried rice

Nutrition Facts

about 130 servings per container
Serv. size: 1Tbsp (15mL)

Amount per serving
Calories 120

	% DV*
Total Fat 14g	**18%**
Saturated Fat 2g	**10%**
Sodium 0mg	**0%**
Total Carbohydrate 0g	**0%**
Protein 0g	**0%**

The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: EXTRA VIRGIN OLIVE OIL
PRODUCT OF SPAIN.
DISTRIBUTED BY: DRUPELY INC,
185 WYTHE AVE, 2ND FLOOR
BROOKLYN NY 11249
STORAGE: STORE IN A COOL, DRY PLACE, AWAY FROM DIRECT LIGHT.

Value Size

NON GMO Project VERIFIED nongmoproject.org

8 50062 39304 2

295 mm

FDA | U.S. Food and Drug Administration
Food Facility Registration

Date: 10/01/2024 11:32:23

Created Date
2021-12-16 09:36:33.0

Created by
ace77891

Registration Expiration Date
2026-12-31

Registration Renewed Date
2024-10-01

Last Updated
2024-10-01

Registration Status Reason
Biennial Registration Renewal - 2022

Registration Status
VALID

Is this facility engaged in the manufacturing/processing, packing, or holding of food for human or animal consumption in the United States?
(●) **Yes** ( ) **No**

Are you a fishing vessel engaged in processing (21 CFR 1.226(f))?
( ) **Yes** ( ) **No**

Section 1: Type of Registration

Facility Location : **Foreign Registration**

UPDATE OF REGISTRATION INFORMATION: *Registration Number:* ***13622859374*** Pin No

Are you the new owner of a previously registered facility?

( ) **Yes** (●) **No**

Previous Owner's Title:
Previous Owner's Name :
Previous Owner's Registration Number :

Section 2: Facility Name/Address Information

Facility Name
ACEITES DEL SUR-COOSUR SA

Facility Name Suffix
Company

Facility Street Address, Line 1
CARRETERA LA CAROLINA 29

Facility Street Address, Line 2

City
VILCHES

State/Province/Territory
Jaen

Zip/Postal Code
23220

Country/Area
SPAIN

Telephone Number
034 95 3631165

Fax Number

E-Mail Address
JMGONZALEZ@ACESUR.COM

Unique Facility Identifier (UFI)
477675276

Section 3: Preferred Mailing Address Information

Complete this section if different from Section 2 Facility Name/Address Information (OPTIONAL)

Is the preferred mailing address the same as the facility address (Section 2)? Yes

Name
ACEITES DEL SUR-COOSUR SA

Address, Line 1
CARRETERA LA CAROLINA 29

Address, Line 2

City

Telephone Number
034 95 3631165

Fax Number

E-Mail Address
JMGONZALEZ@ACESUR.COM

VILCHES

State/Province/Territory
Jaen

Zip Code (Postal Code)
23220

Country/Area
SPAIN

Section 4: Parent Company Name/Address Information

(If applicable and if different from Sections 2 and 3). If information is the same as another section, check which section:

- (●) **Same as Facility Address (Section 2)**
- ( ) **Same as Preferred Mailing Address (Section 3)**
- ( ) **None of the above**

Company Name
ACEITES DEL SUR-COOSUR SA

Company Name Suffix
Company

Address, Line 1
CARRETERA LA CAROLINA 29

Address, Line 2

City
VILCHES

State/Province/Territory
Jaen

Zip Code (Postal Code)
23220

Country/Area
SPAIN

Telephone Number
034 95 3631165

Fax Number

E-Mail Address
JMGONZALEZ@ACESUR.COM

Section 5: Facility Emergency Contact Information

If information is the same as another section, check which section:

- (●) **Same as Facility Address (Section 2)**
- ( ) **Same as U.S. Agent Information (Section 7)**
- ( ) **None of the above**

Individual's Title *(Optional)*

Individual's Name *(Optional)*

Individual's Middle Name *(Optional)*

Individual's Last Name *(Optional)*

Emergency Contact Phone
034 95 3631165

E-mail Address
JMGONZALEZ@ACESUR.COM

Job Title *(Optional)*

Section 6: Trade Names

(If this facility uses trade names other than that listed in Section 2 above, list them below (e.g., "Also doing business as," "Facility also known as"))

Are there alternate trade names used by your facility in addition to the name provided in **Section 2: Facility Name/Address Information?**
( ) **Yes** (●) **No**

Section 7: United States Agent

(To be completed by facilities located outside any state or territory of the United States, District of Columbia, or The Commonwealth of Puerto Rico)

U.S. Agent ID
USID7071534

Name
Spain U.S. Chamber of Commerce

Address, Line 1

Telephone Number
305 3585988

Emergency Contact Phone
305 3585988

Fax Number

2153 Coral Way, Suite 400

Address, Line 2

City
Miami

State/Province/Territory
Florida

Zip Code (Postal Code)
33145

Country/Area
UNITED STATES

305 3586844

E-Mail Address
fda@spainchamber.org

Section 8: Seasonal Facility Dates of Operation *(Optional)*

Give the approximate dates that your facility is open for business, if its operations are on a seasonal basis *(Optional)*.

Harvest 1
Start Month

End Month

Harvest 2
Start Month

End Month

Section 9: General Product Categories - Human/Animal/Both

☑ **Food for Human Consumption** ☐ **Food for Animal Consumption**

Section 9a: General Product Categories - Food for Human Consumption; and Type of Activity Conducted at the Facility

To be completed by all food facilities. Please see instructions for further examples. IF NONE OF THE MANDATORY CATEGORIES BELOW APPLY, SELECT BOX 37.	Ambient Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks, grain elevators)	Refrigerated Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks)	Frozen Food Storage Warehouse / Holding Facility (e.g., storage facilities)	Acidified Food Processor	Low-Acid Food Processor	Interstate Conveyance Caterer / Catering Point	Contract Sterilizer	Labeler / Relabeler	Manufacturer / Processor	Packer / Repacker	Salvage Operator (Reconditioner)	Farm Mixed-Type Facility	Other Activity Conducted (Please Specify)
13. DRESSING AND CONDIMENTS [21 CFR 170.3 (n) (8), (12)]	☑	☐	☐	☑	☐	☐	☐	☐	☑	☐	☐	☐	☐
34. VEGETABLE OILS (INCLUDES OLIVE OIL) [21 CFR 170.3 (n) (12)]	☑	☐	☐	☐	☐	☐	☐	☑	☑	☐	☐	☐	☐

Section 10: Owner, Operator, or Agent-in-Charge Information

Provide the following information, if different from all other sections on the form. If information is the same as another section of the form, check which section:

If information is the same as Section 2, check the box:

- ◉ **Section 2 - Facility Address Information**
- ○ **Section 3 - Preferred Mailing Address Information**
- ○ **Section 4 - Parent Company Address Information**
- ○ **Section 7 - U.S. Agent Address Information**
- ○ **None of the above**

Name of Entity or Individual Who is the Owner, Operator, or Agent-in-Charge : JOSE MANUEL GONZALEZ GARCIA

Address, Line 1
CARRETERA LA CAROLINA 29

Address, Line 2

City
VILCHES

State/Province/Territory
Jaen

Zip Code (Postal Code)
23220

Country/Area

Telephone Number
034 95 3631165

Fax Number

E-Mail Address
JMGONZALEZ@ACESUR.COM

SPAIN

Section 11: Inspection Statement

☑ **FDA will be permitted to inspect the facility at the time and in the manner permitted by the Federal Food, Drug, and Cosmetic Act.**

Section 12: Certification Statement

The owner, operator, or agent-in-charge of the facility, or an individual authorized by the owner, operator, or agent-in-charge of the facility, must submit this form. By submitting this form to FDA, or by authorizing an individual to submit this form to FDA, the owner, operator, or agent-in-charge of the facility certifies that the above information is true and accurate. An individual (other than the owner, operator or agent-in-charge of the facility) who submits the form to the FDA also certifies that the above information submitted is true and accurate and that he/she is authorized to submit the registration on the facility's behalf. An individual authorized by the owner, operator, or agent-in-charge must below identify by name the individual who authorized submission of the registration. Under 18 U.S.C 1001, anyone who makes a materially false, fictitious, or fraudulent statement to the U.S. Government is subject to criminal penalties.

NAME OF PERSON SUBMITTING THIS REGISTRATION RENEWAL: JOSE MANUEL GONZALEZ GARCIA

CHECK ONE BOX

- ◉ **A. INDIVIDUAL ASSOCIATED WITH THE INFORMATION IN SECTION 10 (STOP HERE, FORM IS COMPLETED)**
- ○ **B. ANOTHER AUTHORIZED INDIVIDUAL**

Address Information for the Authorizing Individual:

Individual's Name
-N/A-

Address, Line 1
-N/A-

Address, Line 2
-N/A-

City
-N/A-

State/Province/Territory
-N/A-

Zip Code (Postal Code)
-N/A-

Country/Area
-N/A-

Telephone Number
-N/A-

Fax Number
-N/A-

E-Mail Address
-N/A-

Search Result

FEI Number:	3010677724
Firm Name:	Aceites Del Sur- Coosur
Physical Address	
Line 1 Address:	Carretera La Carolina 29
Line 2 Address:	
City:	Vilches
State:	
Province:	Jaen
Zip/Mail Code:	23220
Country:	ES - SPAIN
Mailing Address	
Line 1 Address:	Ctra De La Carolina Km 29
Line 2 Address:	
City:	Vilches
State:	
Province:	Jaen
Zip/Mail Code:	23220
Country:	ES - SPAIN

FEI Number
3010677724

Firm Name
Aceites Del Sur- Coosur

Firm Address
Carretera La Carolina 29
Vilches
Spain

FDA Actions Timeline