UNITED SAFETY AGENTS

FSVP

COMPLIANCE PLAN

P&L IMPORTS LLC

Name of FSVP Importer

RISO SCOTTI SPA

Name of Foreign Supplier

RISOTTO / RICE-BASED MILLED GRAIN PRODUCT

Name of Product

NOVEMBER 20, 2020 / NOVEMBER 10, 2021

Date of Initial Verification / Reverification

NOVEMBER 11, 2022

Date of FSVP Plan Expiration

VERIFICAITON COMPLETE | APPROVED FOR IMPORT

Result of Verification

NUMBER 02

Version

– Confidential –

– TABLE *of* CONTENTS –

I. **Overview** *of* **FSVP Plan** . . . . . **Pg. 03**
Instructions for Client, Definitions, and Confidentiality & Term

II. **Foreign Supplier Verification Procedures** . . . . . **Pg. 04** *to* **06**

III. **Frequency** *of* **Verification Procedures** . . . . . **Pg. 06**

IV. **Use** *of* **Approved Suppliers Only**

V. **Corrective Actions**

VI. **Identification** *of* **FSVP Importer**

VII. **Code** *of* **Federal Regulations** *(C.F.R.)* **Assessment** . . . . . **Pg. 07**

VIII. **21 C.F.R. §1.500-14 Assessment** . . . . . **Pg. 08**

IX. **Attestation** *of* **Client's Review & Assessment** . . . . . **Pg. 09**

X. **Entity Information & Executive Summary** *of* **Review** . . . . . **Pg. 10**
FSVP Importer, foreign Supplier, FSVP Qualified Individual(s) &/or FSVP Agent(s), and Summary of Assessment.

XI. **FSVP Documentation Checklist** . . . . . **Pg. 11**
Hazard Analysis, On-site Audit, Sampling or Testing Results Other Food Safety Records, and Product Labeling.

XII. **Ongoing Document Requirements** . . . . . **Pg. 12**

XIII. **Description** *of* **Initial Verification Activities** . . . . . **Pg. 13**

XIV. **Description** *of* **Ongoing Verification Activities** . . . . . **Pg. 14**

XV. **Frequency** *of* **Ongoing Verification Activities**

XVI. **FDA Compliance Actions** *&* **Regulatory History** . . . . . **Pg. 15**

XVII. **Log** *of* **Revisions / Version Numbers** . . . . . **Pg. 16**

XVIII. **Analysis** *of* **Biological Hazard***(s)* . . . . . **Pg. 17**

XIX. **Analysis** *of* **Chemical Hazard***(s)* . . . . . **Pg. 18**

XX. **Analysis** *of* **Allergenic Hazard***(s)* . . . . . **Pg. 19**

XXI. **Analysis** *of* **Environmental & Process Hazard***(s)* . . . . . **Pg. 20**

XXII. **Analysis** *of* **Physical Hazard***(s)* . . . . . **Pg. 21**

XXIII. **Assessment** *of* **Foreign Supplier** . . . . . **Pg. 22**
Supplier Procedures, Processes & Practices, Performance–History, and Approval or Denial Notes.

XXIV. **General Food Safety Information & Review** . . . . . **Pg. 23** *to* **24**

XXV. **Addendum** . . . . . **Pg. 25** *to* **27**

XXVI. **FSVP Agent's Certifications & Qualifying Documents** . . . . . **Pg. 28** *to* **36**

XXVII. **Foreign Supplier's Documentation** . . . . . **Pg. 37** ⟼

OVERVIEW *of* FSVP PLAN

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

INSTRUCTIONS

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

TERMS & DEFINITIONS

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

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

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

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

RULES *of* USE

FOREIGN SUPPLIER VERIFICATION PROCEDURES

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

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

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

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

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

Continued onto next page.

FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

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

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

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

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

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

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

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

Continued onto next page.

FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

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

FREQUENCY *of* VERIFICATION PROCEDURES

All 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: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

UNITED STATES CODE *of* FEDERAL REGULATIONS

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

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

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

21 C.F.R. §1.500–§1.514

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

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

NOTES & COMMENTS

FSVP 21 CFR §1.500–§1.514

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

Supplier: Riso Scotti SpA Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ATTESTATION *of* REVIEW & ASSESSMENT

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

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

its contents to be acceptable.

Reviewer's Name: _____

Reviewer's Signature: _____

Reviewer's Title: _____

Supplier: Riso Scotti SpA Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

DESIGNATION *of* ROLES & SUMMARY *of* REVIEW

FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: P & L Imports FDA FEI: Not Available.

Physical Address: 10051 East Dynamite Boulevard, Suite G-160 DUNS No.: 117230310

City: Scottsdale State: Arizona Country: United States

Mailing Address: 10051 East Dynamite Boulevard, Suite G-160

City: Scottsdale State: Arizona Country: United States

Phone Number: +1 (480) 493-5304 Email Address: chris@pandlimports.com

Name *of* Representative*(s)*: Mr. Chris Mohrweis Title: Operations Manager

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

Company Name: Riso Scotti SpA FDA FFR:

Manufacturing Address: Scotti, Via Angelo Amati 2 FDA FEI: 3013037778

City: Pavia Province/Territory: Pavia, 27100 Country: Italy

Office Address: Scotti, Via Angelo Amati 2

City: Pavia Province/Territory: Pavia, 27100 Country: Italy

Phone Number: +39 0382 5081 Email Address: pesce@risoscotti.it

Name *of* Representative*(s)*: Gian Luca Pesce Title: Commercial Rep.

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

Agent/QI Name: Claudio Innocenti Signature: Claudio Innocenti

Title: Partner & Preventive Controls Qualified Individual. Date: Nov. 10 2021

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**	
	☐ 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: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

REGISTER *of* SUBSTANTIATING DOCUMENTS

HAZARD ANALYSIS

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

NOTES Riso Scotti SpA's HACCP Plan received.
Dated: June 05, 2020
Plan Entitled: The Food Safety Plan – HACCP
Version: No. 01
Prepared By: Giovanni Avaldi.

Riso Scotti SpA's Food Safety Manual received.

ON-SITE AUDIT

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

NOTES Riso Scotti SpA's Audit Report received.
Dated: June 05, 2020
Re-audit Due Date: June 17, 2021
Audit Grade: A
Number of Minor Non-conformities: 09. With corresponding corrective actions.
Previous Audit Grade: A
Previous Audit Date: June 10, 2019
Note: We respectfully request an updated copy of the supplier's annual on-site audit report.

SAMPLING OR TESTING RESULTS

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

NOTES Certificate of Analysis received from supplier.
Dated: June 05, 2020
Tested for: Risk from environmental contaminants (molds and yeasts)
Laboratory: BRC Global Standard

OTHER FOOD SAFETY RECORDS

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

NOTES Riso Scotti SpA's Venor Qualifications received.
Dated: 2015.

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: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

VERIFICATION FREQUENCY *for* UPDATED DOCUMENTS

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

FACILITY FOOD SAFETY PLAN

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

HACCP PLAN / HARPC PLAN

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

ON-SITE AUDIT RESULTS

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

LABORATORY TESTING RESULTS

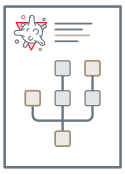
- ☑ if positive results are returned
- ☑ if recall or import refusal occurs
- ☑ if inspection occurs
- ☐ on an annual basis
- ☐ on a per-batch/shipment basis
- ☑ Chemical ☑ Biological
- ☐ *other:*_____

FDA REGISTRATION

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

FACILITY LICENSE

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



RECALL PLAN

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

PRODUCT LABEL

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

QUALIFICATIONS

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

IMPLEMENTATION RECORDS

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

FSVP QUESTIONNAIRE

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

NOTES

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

unitedsafetyagents.com/documents

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

INITIAL VERIFICATION ACTIVITIES

To confirm that all relevant or identified food safety hazards requiring a control have been significantly minimized or prevented, the below enumerated activities were used to initially verify Risotto supplied by Riso Scotti SpA:

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

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

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

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

NOTE

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

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ONGOING VERIFICATION ACTIVITIES

To confirm that all relevant or identified hazards requiring a control, for Risotto, supplied by Riso Scotti SpA, continue to be significantly minimized or prevented prior to public distribution, up-to-date versions of all documents used during the initial FSVP verification and approval processes will be re-acquired at least once every three years – or sooner, per the following document-specific requirements:

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

An updated version of Riso Scotti SpA's HACCP PLAN will be required if any change or update occurs. Riso Scotti SpA 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 Riso Scotti SpA's most up-to-date copy.

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

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

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

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

An updated version of the product's LABELING will be required if any change or update occurs. Riso Scotti SpA has been informed of this ongoing requirement and USA will confirm annually that the label on file remains current.

NOTE

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

FREQUENCY *of* VERIFICATION ACTIVITIES

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

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

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

FDA COMPLIANCE ACTIONS & REGULATORY HISTORY

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

RESULTS *of* EVALUATION

Date *of* Action	Description *of* Action
December 28, 2013	IMPORT REFUSAL Shipment ID: BZK-0052433-7/1/1/. Refusal Charges: 3721. Product Code and Description: 02AVT05 \ RICE. CULTIVATED, WHOLE GRAIN.
December 28, 2013	IMPORT REFUSAL Shipment ID: BZK-0052433-7/1/2/. Refusal Charges: 3721. Product Code and Description: 02AVT05 \ RICE. CULTIVATED, WHOLE GRAIN.
	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: Riso Scotti SpA | FEI: 3013037778 | Date: Nov. 10 2021

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

REVISION LOG *for* FSVP PLAN

Version No.	Date *of* Change	Description *of* Revision
No. 01	November 20, 2020	Product and supplier underwent initial FSVP verification.
No. 02	November 10, 2021	Foreign Supplier and product underwent annual verification. Additional and/or updated food safety documents were requested, received, and added to FSVP. FSVP content and format was updated to reflect recent FDA Guidance document(s) and/or regulatory statues that became applicable since initial verification, or previous reverification.

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ANALYSIS & DETERMINATION *of* BIOLOGICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☑ ***Bacillus cereus*** ☐ ***Clostridium botulinum*** ☐ ***C. perfringens*** ☐ ***Brucella spp.*** ☐ ***Campylobacter spp.*** ☐ ***Pathogenic E. coli*** ☑ ***Salmonella spp.*** ☐ ***S. aureus*** ☐ ***L. monocytogenes*** ☐ ***Trichinella spiralis*** ☐ ***Giardia lamblia*** ☐ ***Shigella spp.*** ☐ ***Other***	1	3	Biological hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the application of a heat and/or chemical kill-step, implementing and following raw material supplier approval procedures, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes Heat Application (thermal kill step) to control hazards posed by biological agents. Details: Critical limits for the sterilization process are minimum F0 equal to 4, the sterilization process is 50 'at a temperature above 100 ° C, with release of the batch following the verification of stability in the oven. 02. Supplier utilizes laboratory testing of finished product to verify that biological hazards have been effectively controlled. Details: Microbiological tests are carried out with ten days of incubation in an incubator at 32 ° C. Each batch of "Rapid"rice (product subjected to an autoclave cycle) is sampled and sent to "Protezione ambientale" Lab (Accredia no. 0381) to check stability by means of a 2-week incubation test in an incubator for a TB test at 32 ° C. 03. All staff undergoes formal food hygiene training. 04. All staff issued protective clothing. 05. All production operatives are required to cover head/facial hair within the manufacturing area. 06. Adequate toilet and hand washing facilities provided. 07. 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: Milled Grain Products. Category No.: 7 Subcategory: Rice and rice products. Storage: Shelf-Stable ——————— ———————

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

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: CCP for aflatoxins on incoming paddy rice (correlated with the humidity of the raw material), with critical limits of 14.5% humidity on each batch: each truck is sampled in 5 points, with control of defects in the internal laboratory on 3 kg of paddy rice. If the humidity is 15%, the trucks are blocked and QA makes a decision on the use or rejection of the batch. ——————————NOTE—————————— We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory).	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. ——————————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Products. Category No.: 7 Subcategory: Rice and rice products. Storage: Shelf-Stable ——————————— ———————————

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

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****	-	-	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) there are NO allergens are present in product. Milk, Soy, Shellfish, and Fish 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——————— ---------- Labeling Requirements ---------- - Food Allergen Labeling and Consumer Protection Act - ---------- - Nutritional information (not appliance to bulk). - Name and place of business of the manufacturer, packer, or distributor (21 CFR 101.5). - Quantity of contents (21 CFR 101.7). - Statement of identity (21 CFR 101.3). - Presence of artificial flavoring, artificial coloring, or chemical preservative (21 CFR 101.22). - Ingredient statement if the product has two or more ingredients (21 CFR 101.4). - Presence of major food allergens (21 U.S.C. 343(w)). - Percent juice (21 CFR 101.30), when applicable.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control the hazard posed by allergenic adulteration. Note: USA's assessment of product(s) labeling is restricted to a label(s)' allergen disclosure statement and should not be interpreted to meant that the label(s) meets all requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act), the Food Allergen Labeling and Consumer Protection Act (FALCPA), or any other applicable section of 21 CFR Part 101. USA recommends that FSVP Importer independently confirm that product label(s) is in compliance with all applicable regulations prior to import. _____ ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Products. Category No.: 7 Subcategory: Rice and rice products. Storage: Shelf-Stable _____ _____

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ANALYSIS & DETERMINATION *of* ENVIRONMENTAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☒ ***Recontamination with environmental pathogens.*** ☐ ***Bacterial pathogen survival of a lethal treatment.*** ☒ ***Bacterial growth and/or toxin formation due to lack of time / temperature control.*** ☐ ***Recontamination due to lack of container integrity.*** ☐ ***Bacterial growth and/or toxin formation due to poor formulation control.*** ☐ ***Bacterial growth and/or toxin formation due to reduced oxygen packaging.*** ☐ ***Other***	1	2	Hazards posed by ineffective processes or environmental pathways can be controlled by the utilization of Current Good Manufacturing Practices, positively releasing finished product, avoiding cross-contamination, carefully monitoring production process, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Hazard posed by recontamination with environmental pathogens is controlled through Current Good Manufacturing Practices. 02. Supplier has implemented a cleaning program and environmental monitoring for microbiological and biological hazards. 03. All product is positively released and hermetically sealed. 04. QI closely monitors time/temp during production. Finished product has low aW, Validated by PCQI. 05. Supplier utilizes measures such as dehydration, MAP or nitrogen packaging (for dehydrated people), sterilization treatment to control hazards posed by biological agents. Details: The company carries out stress challenge checks to evaluate any organoleptic alterations of the product.	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: Milled Grain Products. Category No.: 7 Subcategory: Rice and rice products. Storage: Shelf-Stable

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ANALYSIS & DETERMINATION *of* PHYSICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☒ ***Metal*** ☐ ***Glass*** ☐ ***Extraneous Matter*** ☐ ***Plastics*** ☐ ***Stones*** ☐ ***Wood*** ☐ ***Natural Component of Food*** ☐ ***Other***	1	2	Physical hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the utilization of an operational and calibrated metal detector during and/or after the production process, sieving raw material and/or finished product, optical sorting machinery, visual inspection, appropriate and consistent raw material supplier approval methods, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes an operational and calibrated metal detector to control hazards posed by physical agents. Metal Detector's Critical Limits Ferrous: 03 mm. Non Ferrous: 03 mm. Stainless Steel: 03 mm. 02. Glass and Breakable Plastic Program in use. 03. Supplier sieves incoming ingredients.	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: Milled Grain Products. Category No.: 7 Subcategory: Rice and rice products. Storage: Shelf-Stable

Legend *for* Hazard Analysis & Determination

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

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

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

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

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

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

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

Source

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

Supplier: Riso Scotti SpA Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ASSESSMENT *of* FOREIGN SUPPLIER

1.0 FOREIGN SUPPLIER INFORMATION

1.1. Supplier name: Riso Scotti SpA 1.2. Supplier country: Italy

1.3. Products manufactured/supplied: Risotto

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

Standard: BRCFS Issue 8.

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: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Claims Made Against Product

General: Organic – Kosher – Fairtrade – Gluten free.

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

Overview *of* Foreign Supplier's Commercial Operation

Supplier processes Risotto, White Rice, Parboiled Rice, Express Rice, Vegetal drinks, Risotti Dry, Rice Cakes

All ambient stable products. Dry products (rice, dehydrated rice bags, snacks): low water level (less than 14%); Drinks based on rice, oats or soy: subjected to UHT cycle (141.5 ° C for soy - 142.5 ° C for rice and oats all for a time of 15 "); not dry products: autoclave sterilization process (100 ° C for 50 'with peak at 124 ° C - F0> o = 4)

Testing Program & Accreditation

Riso Scotti SpA uses internal laboratory testing to confirm that product is free from biological hazards prior to release.
* Note: information may not have been independently corroborated.

Certificate of Analysis received from supplier. Dated: June 05, 2020. Tested for: Allergens and Microbiological hazards. Laboratory: BRC Global Standard.

Heavy Metal test results requested.

Supplier & Product Allergen Information

Supplier certifies that: A) a documented allergen control program is in use, B) a dedicated process line and a documented cleaning procedure are in place to prevent contamination, C) 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: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Supplier GFSI Status & Historical Performance

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

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

We respectfully request:

- Recent laboratory testing results for all FDA-identified biological hazards (preferably by an ISO 17025-accredited laboratory).
- Recent laboratory testing results for all FDA-identified chemical hazards (preferably by an ISO 17025-accredited laboratory).
- Recent results of supplier's complete, on-site audit report results (written in English, and preferably by a GFSI-accredited firm).

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ADDENDUM

NOTE

Labeling Requirements

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

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

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

Food Allergen Labeling and Consumer Protection Act

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ADDENDUM

INTENTIONALLY

BLANK PAGE

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

ADDENDUM

INTENTIONALLY

BLANK PAGE

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

Claudio Innocenti

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

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on
05/13/2021

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti

AFDO

Certificate # 31d8ad94

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

Claudio Innocenti

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

FSPCA Preventive Controls for Animal Food

delivered by Lead Instructor

Charles Nolan

completed on
07/09/2020

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

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

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AAFCO
Association of American Feed Control Officials

Certificate # 223faa17

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA

FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

CLAUDIO INNOCENTI

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

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on

09/14/2018

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

IFSH | INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

Gerald Wojtala, Executive Director
International Food Protection Training Institute

ifpti | INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

Joseph Corby, Executive Director
Association of Food and Drug Officials

AFDO

Certificate # d2e9c287

Produce Safety
ALLIANCE

AFDO
ASSOCIATION OF FOOD & DRUG OFFICIALS
SINCE 1896

Certificate of Training

is awarded to

Claudio Innocent

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

PSA Grower Training Course

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

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

Joseph Corby
Executive Director, AFDO

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

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

CLAUDIO INNOCENTI

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

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on

05/31/2018

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

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AFDO

Certificate # d2e9c287

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

09/14/2017

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

AFDO

Certificate # d2e9c287

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

CLAUDIO INNOCENTI

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

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

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AFDO

Certificate # 2d697331

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

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

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti

Certificate # ed6f0b58

AFDO

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:

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

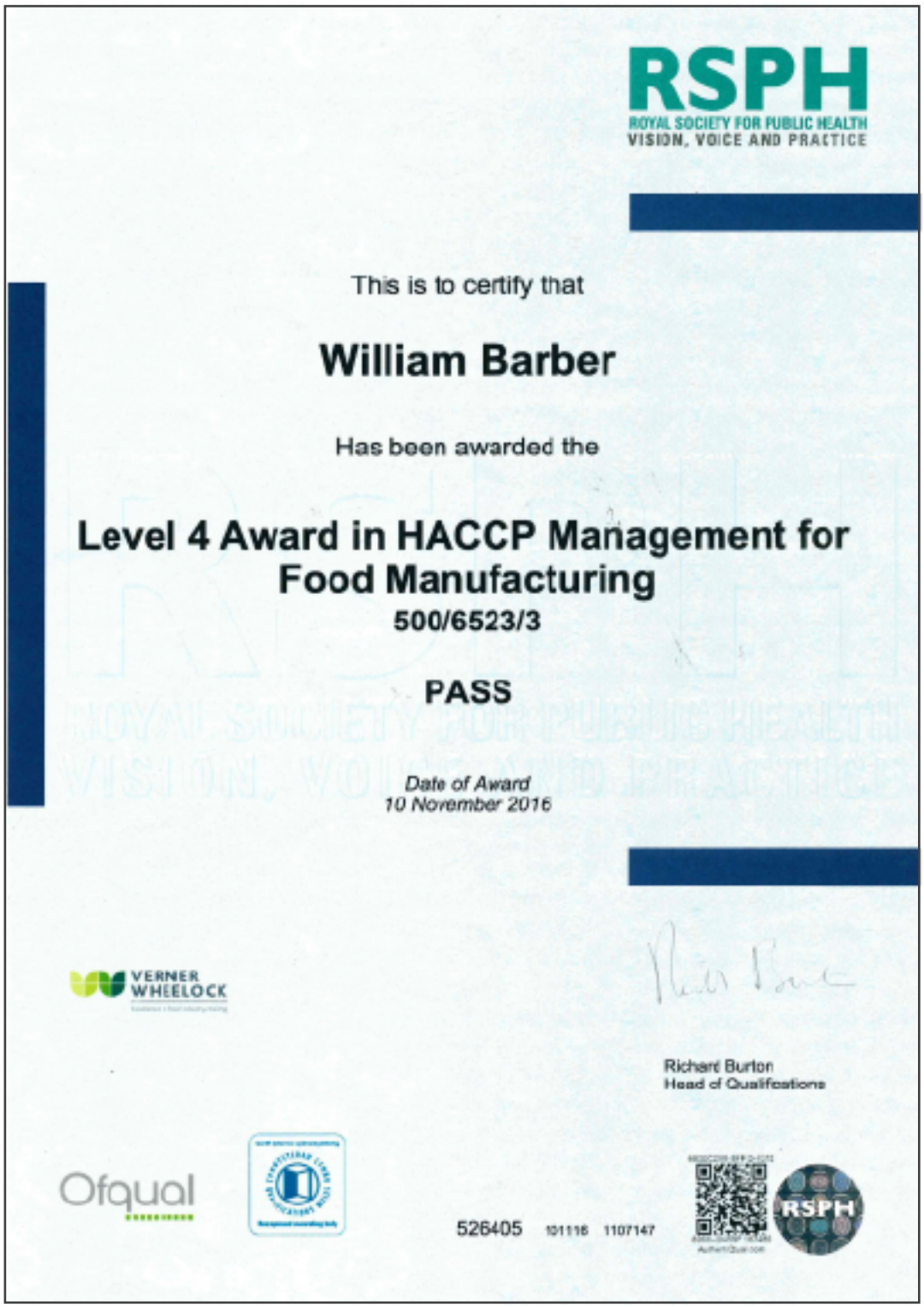
Certificate # 917b0241

AFDO

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

QUALIFICATIONS *of* SUPPORTING QI



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

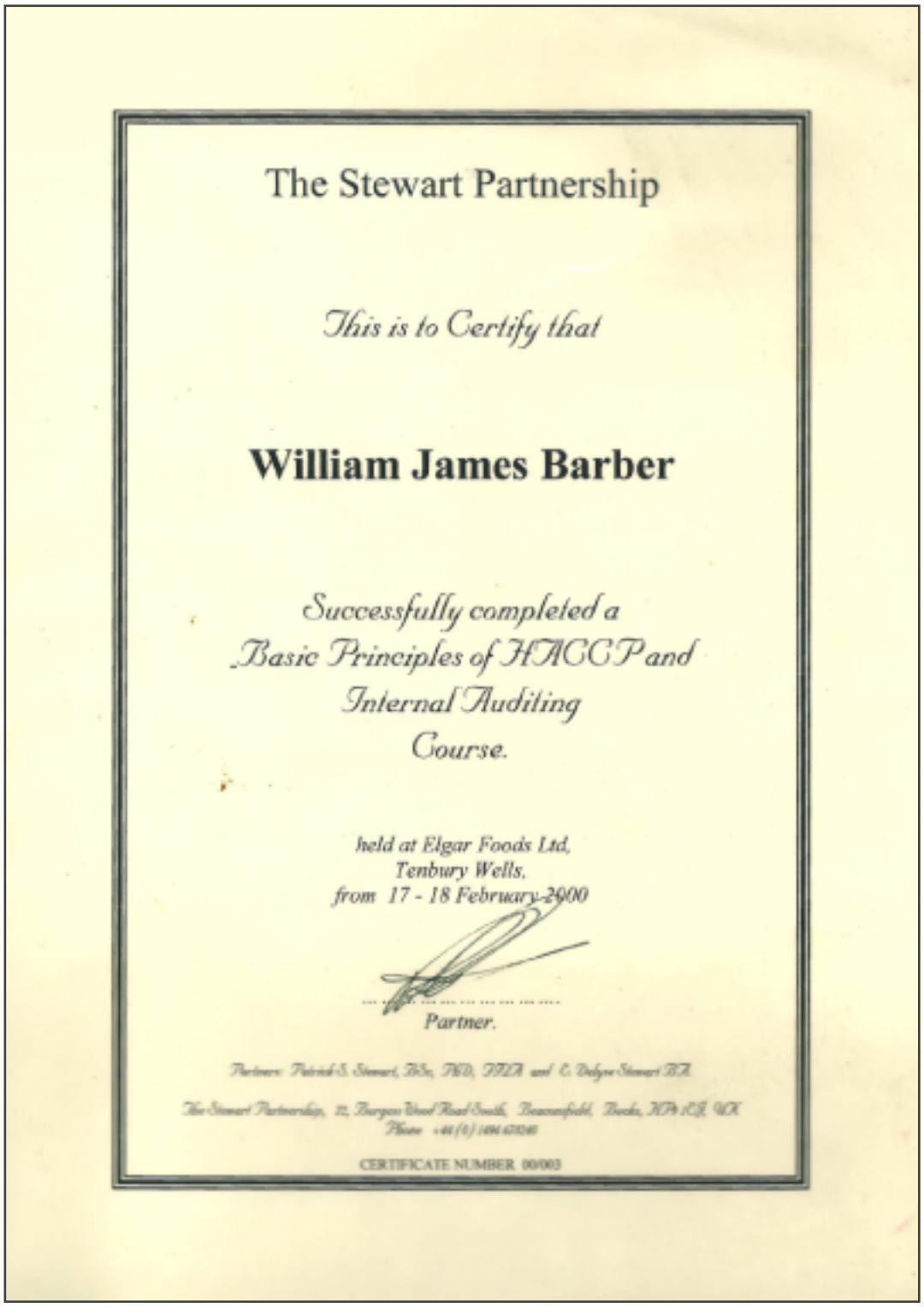
526405 101116 1107147

RSPH

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

QUALIFICATIONS *of* SUPPORTING QI



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. Dafyn Stewart BA

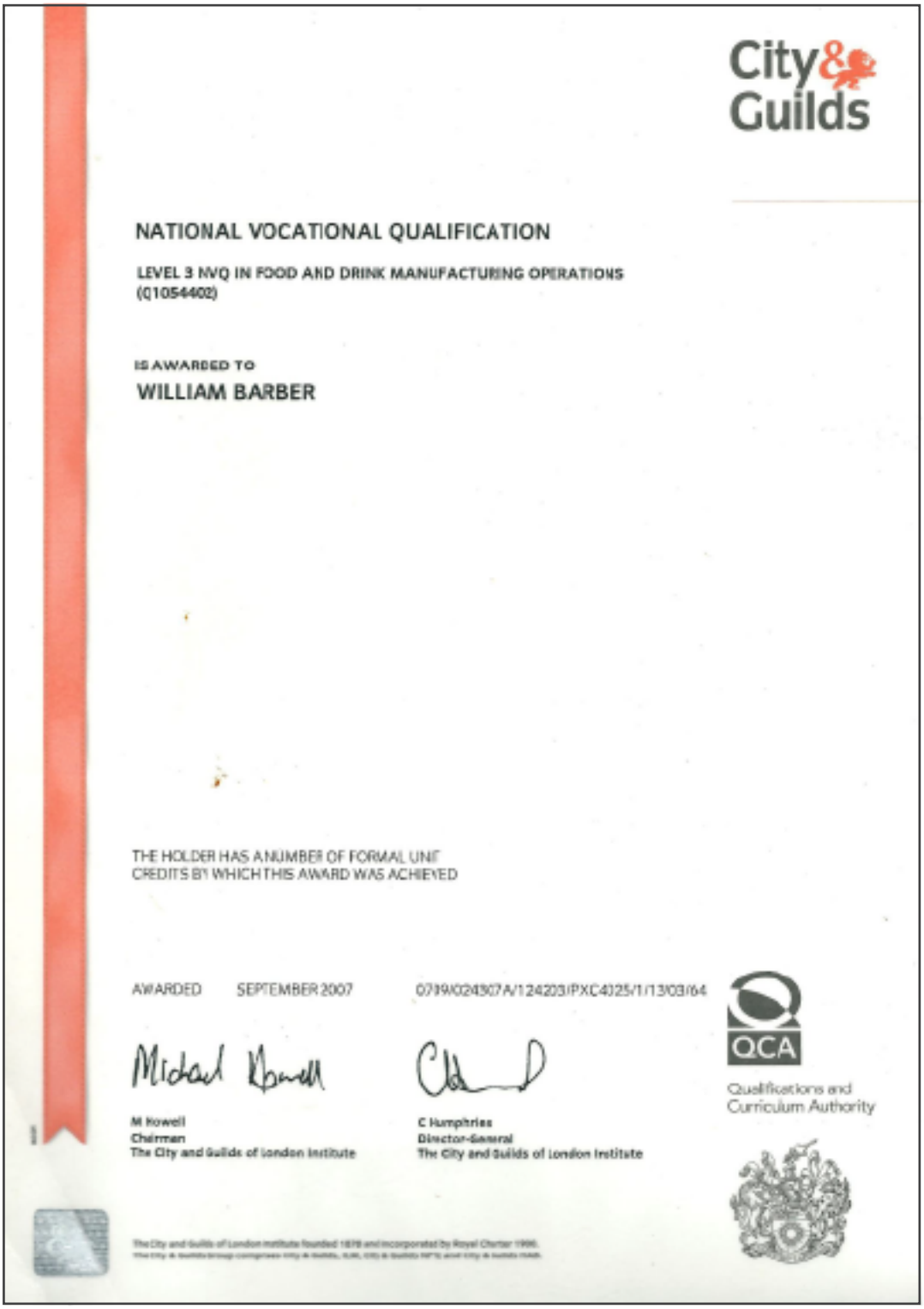
The Stewart Partnership, 22, Burgess Wood Road South, Beaconsfield, Bucks, HP9 1EJ, UK
Phone +44 (0) 1494 672040

CERTIFICATE NUMBER 00003

Supplier: Riso Scotti SpA | Product: Risotto

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: Oct. 27, 2021 | Review End: Nov. 10 2021

QUALIFICATIONS *of* SUPPORTING QI



City & Guilds

NATIONAL VOCATIONAL QUALIFICATION

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

IS AWARDED TO

WILLIAM BARBER

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

AWARDED SEPTEMBER 2007

0739/024907A/124203/PXC4025/1/13/03/64

M Howell
Chairman
The City and Guilds of London Institute

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

QCA
Qualifications and Curriculum Authority

The City and Guilds of London Institute founded 1878 and incorporated by Royal Charter 1900.

QUALIFICATIONS *of* SUPPORTING QI

City & Guilds

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

IS AWARDED TO
WILLIAM BARBER

WHO ATTENDED PERSHORE GROUP OF COLLEGES

AND WAS SUCCESSFUL IN THE
FOLLOWING TEN UNITS

CONTROL AND MAINTAIN QUALITY WITHIN MULTI-STAGE MANUFACTURING OPERATIONS	U1024734
RESOLVE PROBLEMS IN MULTI-STAGE MANUFACTURING OPERATIONS	U1024735
MAINTAIN AND IMPROVE HEALTH AND SAFETY WITHIN THE WORKPLACE	U1024736
MAINTAIN AND IMPROVE HYGIENE AND PRODUCT SAFETY WITHIN THE WORKPLACE	U1024737
CONTRIBUTE TO THE ACHIEVEMENT OF ORGANISATIONAL AND PERSONAL GOALS	U1028661
PROVIDE INFORMATION TO SUPPORT DECISION MAKING	U1026144
MONITOR AND MAINTAIN THE HANDLING AND STORAGE OF MATERIALS	U1024742
IMPLEMENT QUALITY ASSURANCE SYSTEMS	U1027820
DEVELOP A FOOD AND DRINK PRODUCT	U1050074

CONTINUED

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

M Howell
Chairman
The City and Guilds of London Institute

C Humphries
Director General
The City and Guilds of London Institute

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

Supplier: Riso Scotti SpA

Product: Risotto

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

Review Start: Oct. 27, 2021 Review End: Nov. 10 2021

SUBSTANTIATING DOCUMENTS

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

Note 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.

Phase ID	FDA	Material ID	Phase Description	Hazard ID	Hazard details	Effirence	G	P	R	Level of RISK	Q1 Significant	Q2 Specific & Ctrl Measures	Q3 Critical Limit?	Q4 Frq monitoring to ctrl all of the product?	Q5 Subsequent phase minimizes to OK level?	CLASS point	Control Measures	Limits / Tolerances	Monitoring applied	Documents, references, guidelines	Responsibility	Decisions on NC products	Corrective Action	
0		SML	Super-dry processed rice from other process (White + Super-dry Rice)	N/A	N/A	No				0	na	na	na	na	na									No
0	FAC	ING	Dehydrated ingredients CHOPPED	G	Gluten	Yes	3	1	2	6	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan	15 ppm (20 AIC)		AIC rules	CQ	If present and less than 15 ppm, inform vendor.		
0	SCC	ING	Dehydrated ingredients CHOPPED	A	Vendor Management	No				0	na	na	na	na	na									
0	PCC	ING	Dehydrated ingredients CHOPPED	B	Insects	No				0	na	na	na	na	na									
0	PCC	ING	Dehydrated ingredients CHOPPED	B	Rodents	Yes	3	1	2	6	YES	NO	NO	NO	NO	PRP								
0	PCC	ING	Dehydrated ingredients CHOPPED	B	Birds	Yes	3	1	2	6	YES	NO	NO	NO	NO	PRP								
0		ING	Dehydrated ingredients CHOPPED	C	Heavy Metals	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients CHOPPED	C	Agrochemicals	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients CHOPPED	C	Mycotoxins	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients CHOPPED	C	Mineral Oils	Yes	1	1	1	1	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients CHOPPED	F	Low density	Yes	1	2	2	4	YES	NO	NO	NO	NO	PRP								
0		ING	Dehydrated ingredients CHOPPED	F	Average density	Yes	2	1	2	4	YES	NO	NO	NO	NO	PRP								
0		ING	Dehydrated ingredients CHOPPED	F	High density	Yes	3	1	2	6	YES	NO	NO	NO	YES	PRP								
0		ING	Dehydrated ingredients CHOPPED	M	RTC & aW <0.5	Yes	1	1	2	2	NO	NO	NO	NO	NO									
0	SCC	ING	Dehydrated ingredients CHOPPED	O	Vendor Management	No				0	na	na	na	na	na									
0	SCC	ING	Dehydrated ingredients CHOPPED	Q	Vendor Management	No				0	na	na	na	na	na									
0	PRC	ING	Dehydrated ingredients CHOPPED	V	Matching specifications	Yes	1	1	2	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan	n/a			CQ			
0	SCC	ING	Dehydrated ingredients CHOPPED	L	Vendor Management	No				0	na	na	na	na	na									
0	FAC	ING	Dehydrated ingredients POWDERED	G	Gluten	Yes	3	1	2	6	YES	NO	NO	NO	NO	PRP	Vendor oversight and ingredient monitoring plan	15 ppm (20 AIC)		AIC rules	CQ	If present and less than 15 ppm, inform vendor.		
0	SCC	ING	Dehydrated ingredients POWDERED	A	Vendor Management	No				0	na	na	na	na	na									
0	PCC	ING	Dehydrated ingredients POWDERED	B	Insects	No				0	na	na	na	na	na									
0	PCC	ING	Dehydrated ingredients POWDERED	B	Rodents	Yes	1	1	1	1	YES	NO	NO	NO	NO									
0	PCC	ING	Dehydrated ingredients POWDERED	B	Birds	Yes	1	1	1	1	YES	NO	NO	NO	NO									
0		ING	Dehydrated ingredients POWDERED	C	Heavy Metals	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients POWDERED	C	Agrochemicals	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients POWDERED	C	Mycotoxins	Yes	1	2	1	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients POWDERED	C	Mineral Oils	Yes	1	1	1	1	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan				CQ			
0		ING	Dehydrated ingredients POWDERED	F	Low density	Yes	1	2	1	2	YES	NO	NO	NO	NO									
0		ING	Dehydrated ingredients POWDERED	F	Average density	Yes	1	2	1	2	YES	NO	NO	NO	NO									
0		ING	Dehydrated ingredients POWDERED	F	High density	Yes	3	1	1	3	YES	NO	NO	NO	YES									
0		ING	Dehydrated ingredients POWDERED	M	RTC & aW <0.5	Yes	1	1	2	2	NO	NO	NO	NO	NO									
0	SCC	ING	Dehydrated ingredients POWDERED	O	Vendor Management	No				0	na	na	na	na	na									
0	SCC	ING	Dehydrated ingredients POWDERED	Q	Vendor Management	No				0	na	na	na	na	na									
0		ING	Dehydrated ingredients POWDERED	V	Matching specifications	Yes	1	1	2	2	YES	NO	NO	NO	NO		Vendor oversight and ingredient monitoring plan	n/a			CQ			
0		ING	Dehydrated ingredients POWDERED	L	Vendor Management	No				0	na	na	na	na	na									
0		AMB	Pre-operating conditions	G	Gluten	Yes	3	1	2	6	NO	NO	NO	NO	NO	PRP								
0		AMB	Pre-operating conditions	A	Other allergens present in area	No				0	na	na	na	na	na									
0	PCC	AMB	Pre-operating conditions	B	Insects	Yes	2	2	1	4	YES	NO	NO	NO	NO	PRP	Pre-operating checks and periodic pest monitoring	Absence of live insects			Line Operator		Block shipping	
0	PCC	AMB	Pre-operating conditions	B	Rodents	Yes	3	1	2	6	YES	NO	NO	NO	NO	PRP	Pre-operating checks and periodic pest monitoring	Absence of rodents and/or droppings			Contractor		Block shipping	
0	PCC	AMB	Pre-operating conditions	B	Birds	No				0	na	na	na	na	na									
0		AMB	Pre-operating conditions	C	Heavy Metals	No				0	na	na	na	na	na									
0		AMB	Pre-operating conditions	C	Agrochemicals	No				0	na	na	na	na	na									
0		AMB	Pre-operating conditions	C	Mycotoxins	No				0	na	na	na	na	na									
0		AMB	Pre-operating conditions	C	Mineral Oils	No				0	na	na	na	na	na									
0	PRC	AMB	Pre-operating conditions	F	Low density	No				0	na	na	na	na	na									
0	PRC	AMB	Pre-operating conditions	F	Average density	Yes	2	1	2	4	YES	NO	NO	NO	NO	PRP	Integrity check "Hazardous Materials"	Integrity	n/a	CL Hazardous Materials	Line Operator		Block shipping	
0	PRC	AMB	Pre-operating conditions	F	High density	Yes	3	1	2	6	YES	YES	NO	NO	YES	PRP	Integrity check "Hazardous Materials" and Free-flow Magnets	Integrity	Magnet waste verification	Production Sheet + CL Hazardous Materials	Line Operator		Block shipping	
0	PRC	AMB	Pre-operating conditions	M	RTC and Ambient Food	No				0	na	na	na	na	na									
0	SAC	AMB	Pre-operating conditions	O	Environmental risk	No				0	na	na	na	na	na									
0	SAC	AMB	Pre-operating conditions	Q	Environmental risk	No				0	na	na	na	na	na									
0	SAC	AMB	Pre-operating conditions	V	Environmental risk	No				0	na	na	na	na	na									
0	SAC	AMB	Pre-operating conditions	L	Environmental risk	No				0	na	na	na	na	na									
0	FAC	IMP	Pre-operating conditions	G	Gluten	No				0	n/a	n/a	n/a	n/a	n/a									
0	FAC	IMP	Pre-operating conditions	A	Allergens from specific activity	No				0	na	na	na	na	na									
0	PCC	IMP	Pre-operating conditions	B	Insects	Yes	2	2	1	4	YES	NO	NO	NO	NO	PRP	Pre-operating checks and periodic pest monitoring	Absence of live insects			Line Operator		Block shipping	
0	PCC	IMP	Pre-operating conditions	B	Rodents	Yes	3	1	2	6	YES	NO	NO	NO	NO	PRP	Pre-operating checks and periodic pest monitoring	Absence of rodents and/or droppings			Contractor		Block shipping	
0	PCC	IMP	Pre-operating conditions	B	Birds	No				0	na	na	na	na	na									
0		IMP	Pre-operating conditions	C	Heavy Metals	No				0	na	na	na	na	na									
0		IMP	Pre-operating conditions	C	Agrochemicals	No				0	na	na	na	na	na									
0		IMP	Pre-operating conditions	C	Mycotoxins	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	C	Mineral Oils	Yes	2	1	2	4	YES	NO	NO	NO	NO	PRP								
0	PRC	IMP	Pre-operating conditions	F	Low density	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	F	Average density	Yes	2	1	2	4	YES	NO	NO	NO	NO	PRP	Integrity check "Hazardous Materials"	Integrity	n/a	CL Hazardous Materials	Line Operator		Block shipping	
0	PRC	IMP	Pre-operating conditions	F	High density	Yes	2	1	3	6	YES	YES	NO	NO	YES	PRP	Integrity check "Hazardous Materials" and Free-flow Magnets	Integrity	Magnet waste verification	Production Sheet + CL Hazardous Materials	Line Operator		Block shipping	
0	PRC	IMP	Pre-operating conditions	M	RTC and Ambient Food	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	O	N/A	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	Q	N/A	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	V	N/A	No				0	na	na	na	na	na									
0	PRC	IMP	Pre-operating conditions	L	N/A	No				0	na	na	na	na	na									
0	FAC	PER	Pre-operating conditions	G	Gluten	Yes	2	1	1	2	NO	NO	NO	NO	NO									
0	FAC	PER	Pre-operating conditions	A	Allergens from specific activity	No				0	na	na	na	na	na									
0	PCC	PER	Pre-operating conditions	B	Insects	No				0	na	na	na	na	na									
0	PCC	PER	Pre-operating conditions	B	Rodents	No				0	na	na	na	na	na									
0	PCC	PER	Pre-operating conditions	B	Birds	No				0	na	na	na	na	na									
0	PRC	PER	Pre-operating conditions	F	Low density	Yes	1	1	2	2	NO	NO	NO	NO	NO									
0	PRC	PER	Pre-operating conditions	F	Average density	Yes	2	1	2	4	NO	NO	NO	NO	NO	oPRP								
0	PRC	PER	Pre-operating conditions	F	High density	Yes	3	1	2	6	NO	NO	NO	NO	YES	oPRP								
0	PRC	PER	Pre-operating conditions	M	RTC and Ambient Food	No				0	na	na	na	na	na									
0		PER	Pre-operating conditions	O	N/A	No				0	na	na	na	na	na									
0		PER	Pre-operating conditions	Q	N/A	No				0	na	na	na	na	na									
0		PER	Pre-operating conditions	V	N/A	No				0	na	na	na	na	na									
0		PER	Pre-operating conditions	L	N/A	No				0	na	na	na	na	na									
2	PCC	ING	Input Ingredients POWDERED	B	Insects	Yes	2	1	1	2	YES	YES	NO	NO	NO	PRP	Visual verification of absence of insects	Absence of live insects		Input form	Inventory	Batch returned to vendor	Quarantine subsequent lots	
2	PCC	ING	Input Ingredients POWDERED	B	Rodents	Yes	3	1	1	3	YES	YES	NO	NO	NO	PRP	Visual verification of absence of rodents and/or droppings	No droppings		Input form	Inventory	Batch returned to vendor	Warn PC and Immediately NQ vendor	
2	PCC	ING	Input Ingredients POWDERED	B	Birds	No				0	na	na	na	na	na									
2	PRC	ING	Input Ingredients POWDERED	F	Low density	Yes	1	1	1	1	NO	NO	NO	NO	NO									
2	PRC	ING	Input Ingredients POWDERED	F	Average density	No				0	na	na	na	na	na									
2	PRC	ING	Input Ingredients POWDERED	F	High density	No				0	na	na	na	na	na									
2	PRC	ING	Input Ingredients POWDERED	Q	Water Activity & Moisture	Yes	2	1	2	4	YES	YES	YES	NO	NO	PRP	Organoleptic check and moisture test if nec.	parameters		Vendor	CQ	Product quarantined and divided into smaller batches for investigation	Remote vendor audit	
2	PCC	ING	Input Ingredients CHOPPED	B	Insects	Yes	2	1	1	2	YES	NO	NO	NO	NO			Absence of insects		Pest Control	CQ	Batch returned to vendor	Quarantine subsequent lots	

Claudio Innocenti

2	PCC	ING	Input Ingredients CHOPPED	B	Rodents	Yes	3	1	1	3	YES	NO	NO	NO	NO			No droppings		Pest Control	CQ	Batch returned to vendor	Warn PC and Immediately NQ vendor	
2	PCC	ING	Input Ingredients CHOPPED	B	Birds	No				0	na	na	na	na	na									
2	PRC	ING	Input Ingredients CHOPPED	F	Low density	Yes	1	2	1	2	YES	NO	NO	NO	NO									
2	PRC	ING	Input Ingredients CHOPPED	F	Average density	Yes	2	1	2	4	YES	NO	NO	NO	YES	PRP	Vendor qualification, visual check of sample	Absence of CE			CQ	Quarantine any products of the same ingredient batch Destroy PF	NQ vendor, systematic verification of 3 batches	
2	PRC	ING	Input Ingredients CHOPPED	F	High density	No				0	na	na	na	na	na									
2	PRC	ING	Input Ingredients CHOPPED	Q	Water Activity & Moisture	Yes	3	1	1	3	YES	NO	NO	NO	NO	PRP	Vendor qualification, visual check of sample	Absence of CE			CQ	Quarantine any products of the same ingredient batch Destroy PF	NQ vendor, systematic verification of 3 batches	
2	PCC	ING	Mix Ingredients	B	Insects	No				0	na	na	na	na	na									
2	PCC	ING	Mix Ingredients	B	Rodents	No				0	na	na	na	na	na									
2	PCC	ING	Mix Ingredients	B	Birds	No				0	na	na	na	na	na									
2	PRC	ING	Mix Ingredients	F	Low density	No				0	na	na	na	na	na									
2	PRC	ING	Mix Ingredients	F	Average density	No				0	na	na	na	na	na									
2	PRC	ING	Mix Ingredients	F	High density	Yes	2	1	1	2	NO	NO	NO	NO	YES									
2	PRC	ING	Mix Ingredients	Q	Water Activity & Moisture	No				0	na	na	na	na	na									
3	PCC	ING	Dosing Powders, Pieces, SD Rice	B	Insects	No				0	na	na	na	na	na									
3	PCC	ING	Dosing Powders, Pieces, SD Rice	B	Rodents	No				0	na	na	na	na	na									
3	PCC	ING	Dosing Powders, Pieces, SD Rice	B	Birds	No				0	na	na	na	na	na									
3	PRC	ING	Dosing Powders, Pieces, SD Rice	F	Low density	No				0	na	na	na	na	na									
3	PRC	ING	Dosing Powders, Pieces, SD Rice	F	Average density	No				0	na	na	na	na	na									
3	PRC	ING	Dosing Powders, Pieces, SD Rice	F	High density	Yes	2	1	1	2	YES	NO	NO	NO	YES		Neodymium super-magnet	n/a		Control sheet	Operator			
3	PRC	ING	Dosing Powders, Pieces, SD Rice	Q	Water Activity & Moisture	No				0	na	na	na	na	na									
3	PCC	AUS	MAP insertion	B	Insects	No				0	na	na	na	na	na									
3	PCC	AUS	MAP insertion	B	Rodents	No				0	na	na	na	na	na									
3	PCC	AUS	MAP insertion	B	Birds	No				0	na	na	na	na	na									
3	PRC	AUS	MAP insertion	F	Low density	No				0	na	na	na	na	na									
3	PRC	AUS	MAP insertion	F	Average density	No				0	na	na	na	na	na									
3	PRC	AUS	MAP insertion	F	High density	No				0	na	na	na	na	na									
3	PRC	AUS	MAP insertion	Q	Water Activity & Moisture	No				0	na	na	na	na	na									
3	SAC	AUS	MAP insertion	M	RTC and Ambient Food	No				0	na	na	na	na	na									
3	PCC	PF	Unit Sealing	B	Insects	No				0	na	na	na	na	na									
3	PCC	PF	Unit Sealing	B	Rodents	No				0	na	na	na	na	na									
3	PCC	PF	Unit Sealing	B	Birds	No				0	na	na	na	na	na									
3	PRC	PF	Unit Sealing	F	Low density	Yes	2	1	1	2	NO	NO	NO	NO	NO									
3	PRC	PF	Unit Sealing	F	Average density	No				0	na	na	na	na	na									
3	PRC	PF	Unit Sealing	F	High density	No				0	na	na	na	na	na									
3	PRC	PF	Unit Sealing	Q	Water Activity & Moisture	No				0	na	na	na	na	na									
4	PRC	PF	Weight Control	Q	Dosing Ingredients	Yes	1	2	1	2	NO	NO	NO	NO	NO									
4	PRC	PF	Weight Control	L	Net Weight	Yes	2	1	1	2	NO	YES	YES	YES	NO	CP	Systematic constant weighing verified via unit test - T2	Batch net weight < Wn / 1 T2	Statistical receipt verification at end of batch	Production chart	Department Head	Reprocess batch on line after validating functioning with certified set of weights	Extraordinary calibration	
0	PCC	PF	Store packaged goods	B	Insects	No				0	na	na	na	na	na									
0	PCC	PF	Store packaged goods	B	Rodents	No				0	na	na	na	na	na									
0	PCC	PF	Store packaged goods	B	Birds	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	Low density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	Average density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	High density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	Q	Water Activity & Moisture	No				0	na	na	na	na	na									
0	PCC	PF	Store packaged goods	B	Insects	No				0	na	na	na	na	na									
0	PCC	PF	Store packaged goods	B	Rodents	No				0	na	na	na	na	na									
0	PCC	PF	Store packaged goods	B	Birds	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	Low density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	Average density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	F	High density	No				0	na	na	na	na	na									
0	PRC	PF	Store packaged goods	Q	Water Activity & Moisture	No				0	na	na	na	na	na									

Hazard ID	Hazard details	[Eiference]	G	P	R	Level of RISK	Q1 Significant	Q2 Specific & Ctrl Measures	Q3 Critical Limit?	Q4 Frq monitoring to ctrl all of the product?	Q5 Subsequent phase minimizes to OK level?	CLASS point	Control Measures	Limits / Tolerances	Monitoring applied	Documents, references, guidelines	Responsibility	Decisions on NC products	Corrective Action		
C	Heavy Metals	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring					No	
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Mycotoxins	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Heavy Metals	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
O	Use of GMO seeds	Yes	1	1	1	1	NO	NO	NO	NO	NO		GMO analysis + DNA purity where applicable	Only non-EU	PA monitoring			RS rejects NC batch at embarkation	NQ vendor		
V	Seed authenticity	Yes	1	1	1	1	NO	NO	NO	NO	YES		ENR cert. + visual verification upon receipt	5% impurity	Truck	DL 131	CQ	Truck rejected	Suspend contract		
C	Heavy Metals	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Pesticides	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
C	Plant protection products	Yes	1	1	1	1	NO	NO	NO	NO	NO		GAP		PA monitoring						
A	Soy	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
F	Low density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
F	Average density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
F	High density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
C	Mineral oils (MOSH and MOAH)	Yes	2	1	1	2	NO	NO	NO	NO	YES		GAP								
A	Soy	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
F	Low density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
F	Average density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
F	High density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
B	Rodents	Yes	2	1	1	2	NO	NO	NO	NO	YES		GAP								
B	Birds	Yes	2	1	1	2	NO	NO	NO	NO	YES		GAP								
B	Crawling insects	Yes	1	2	1	2	NO	NO	NO	NO	YES		GAP								
B	Flying insects	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
B	Environmental insects	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
C	Pesticides	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP								
A	Soy	Yes	1	1	1	1	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
F	Average density [CE]	Yes	2	1	1	2	NO	NO	NO	NO	YES		GAP		Optical sorting			Contaminated fraction removed			
F	High density [CE]	Yes	2	1	1	2	NO	NO	NO	NO	YES		GAP								
V	Mixing varieties	Yes	2	1	2	4	YES	NO	NO	NO	NO	PRP	Visual verification upon receipt	5% impurity	Truck	DL 131	CQ	Truck rejected	Suspend contract		
O	GMOs	Yes	1	1	1	1	YES	NO	NO	NO	NO		Pre-loading analysis with quarantine	No GMO rice	Embarkation		ACQ	RS rejects NC batch at embarkation	NQ vendor		
V	Non-authentic product	Yes	2	2	1	4	YES	NO	NO	NO	NO	PRP	Pre-loading analysis with quarantine	7% impurity	Embarkation	Basmati COP	ACQ	RS rejects NC batch at embarkation	NQ vendor		
C	Mycotoxins	Yes	3	2	1	6	YES	NO	NO	NO	NO	PRP	Pre-loading analysis with quarantine		Embarkation		ACQ	RS rejects NC batch at embarkation	NQ vendor		
C	Plant protection products	Yes	1	2	1	2	YES	NO	NO	NO	NO		Pre-loading analysis with quarantine		Embarkation		ACQ	RS rejects NC batch at embarkation	NQ vendor		
C	Heavy Metals	No				0	na	na	na	na	na		Not [relevant] for Asia								
A	Soy	Yes	1	1	1	1	YES	NO	NO	NO	YES		Visual verification of sample and when offloading	Presence			CQ	Truck rejected	Suspend contract		
B	Rodents	Yes	2	1	1	2	YES	NO	NO	NO	YES										
B	Birds	Yes	2	1	1	2	YES	NO	NO	NO	YES										
B	Crawling insects	Yes	1	2	1	2	YES	NO	YES	NO	YES	CP	Visual verification of sample and when offloading	1 moving	N/A		CQ	Truck rejected	Suspend contract		
B	Flying insects	Yes	1	1	1	1	NO	NO	NO	NO	YES										
B	Environmental insects	Yes	1	1	1	1	NO	NO	NO	NO	YES										
F	Low density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES										
F	Average density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES										
F	High density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES										
Q	Moisture	Yes	3	1	1	3	YES	YES	YES	YES	NO	CCP	Quick moisture test of sample	≤ 14.5%	5 samples	Codex (15%)	CQ	Truck rejected	Suspend contract		
Q	Presence of foreign odors	Yes	2	1	1	2	YES	NO	NO	NO	NO		Verification of sample when offloading	Presence			CQ	Truck rejected	Suspend contract		
C	Other Heavy Metals (Cu, Sn, Sb, Zn)	No				0	na	na	na	na	na										
C	Mineral oils (MOSH and MOAH)	Yes	3	1	1	3	YES	NO	NO	NO	YES		Overseeing equipment integrity when offloading				CQ	Stop offloading - dump load	Rear discharge		
V	Matching specifications	Yes	2	1	1	2	YES	YES	NO	NO	YES		Verifying declared variety matches	5% impurity		DL 131	CQ	Truck quarantined	Dedicated silo		
M	Mold	Yes	2	1	1	2	YES	NO	NO	NO	NO		Minimum turnover 10 days avg 4 days								
A	Soy	No				0	na	na	na	na	na										
B	Rodents	Yes	2	1	1	2	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
B	Birds	Yes	1	2	1	2	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
B	Crawling insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
B	Flying insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
B	Environmental insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
F	Low density [CE]	Yes	1	3	1	3	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
F	Average density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
F	High density [CE]	Yes	1	2	1	2	YES	NO	NO	NO	YES		Verifying integrity of sifters, screens and aspiration				Operator				
A	Soy	No				0	na	na	na	na	na		Verifying sample after grain selection								
B	Rodents	Yes	2	1	1	2	YES	NO	NO	NO	YES		Verifying sample after grain selection								
B	Birds	Yes	1	2	1	2	YES	NO	NO	NO	YES		Verifying sample after grain selection								
B	Crawling insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying sample after grain selection								
B	Flying insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying sample after grain selection								
B	Environmental insects	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying sample after grain selection								
F	Low density [CE]	Yes	1	3	1	3	YES	NO	NO	NO	YES		Verifying sample after grain selection								
F	Average density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES		Verifying sample after grain selection								
F	High density [CE]	Yes	1	2	1	2	YES	NO	NO	NO	YES		Verifying sample after grain selection								
A	Soy	No				0	na	na	na	na	na										
B	Rodents	Yes	2	1	1	2	YES	NO	NO	NO	YES										
B	Birds	Yes	1	1	1	1	YES	NO	NO	NO	YES										
B	Crawling insects	Yes	1	1	1	1	YES	NO	NO	NO	YES										
B	Flying insects	Yes	1	1	1	1	YES	NO	NO	NO	YES										
B	Environmental insects	Yes	1	1	1	1	YES	NO	NO	NO	YES										
F	Low density [CE]	Yes	1	1	1	1	YES	NO	NO	NO	YES										
F	Average density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES										
F	High density [CE]	Yes	1	1	1	1	YES	NO	NO	NO	YES										
A	Soy	No				0	na	na	na	na	na										
B	Rodents	No	2	1	1	2	YES	NO	NO	NO	YES										
B	Birds	No	1	1	1	1	YES	NO	NO	NO	YES										
B	Crawling insects	No	1	1	1	1	YES	NO	NO	NO	YES										
B	Flying insects	No	1	1	1	1	YES	NO	NO	NO	YES										
B	Environmental insects	No	1	1	1	1	YES	NO	NO	NO	YES										
F	Low density [CE]	No	1	1	1	1	YES	NO	NO	NO	YES										
F	Average density [CE]	Yes	2	1	1	2	YES	NO	NO	NO	YES		Verifying fabric integrity				Operator				

F	High density [CE]	Yes	1	1	1	1	YES	NO	NO	NO	YES		Verifying fabric integrity				Operator				
A	Soy	Yes	1	1	1	1	YES	NO	NO	NO	YES		Proper level of processing				Operator				
B	Rodents	No				0	na	na	na	na	na										
B	Birds	No				0	na	na	na	na	na										
B	Crawling insects	No				0	na	na	na	na	na										
B	Flying insects	No				0	na	na	na	na	na										
B	Environmental insects	No				0	na	na	na	na	na										
F	Low density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES		Proper level of processing				Operator				
F	Average density [CE]	Yes	1	1	1	1	NO				YES		Proper level of processing				Operator				
F	High density [CE]	No				0	na	na	na	na	na										
A	Soy	Yes	1	1	1	1	YES	NO	NO	NO	NO										
B	Rodents	No				0	na	na	na	na	na										
B	Birds	No				0	na	na	na	na	na										
B	Crawling insects	No				0	na	na	na	na	na										
B	Flying insects	No				0	na	na	na	na	na										
B	Environmental insects	No				0	na	na	na	na	na										
F	Low density [CE]	No				0	na	na	na	na	na										
F	Average density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES										
F	High density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	YES										
A	Soy	Yes	1	1	1	1	YES	NO	NO	NO	NO										
B	Rodents	No				0	na	na	na	na	na										
B	Birds	No				0	na	na	na	na	na										
B	Crawling insects	No				0	na	na	na	na	na										
B	Flying insects	No				0	na	na	na	na	na										
B	Environmental insects	No				0	na	na	na	na	na										
F	Low density [CE]	No				0	na	na	na	na	na										
F	Average density [CE]	Yes	3	2	1	6	YES	YES	NO	YES	NO	oPRP	Elimination of [CE] by color and/or refraction		Defect verification		Operator	Quarantined in buffer silo	Review quarantine		
F	High density [CE]	Yes	1	1	1	1	NO	NO	NO	NO	NO										
A	Soy	No				0	na	na	na	na	na										
B	Rodents	No				0	na	na	na	na	na										
B	Birds	No				0	na	na	na	na	na										
B	Crawling insects	No				0	na	na	na	na	na										
B	Flying insects	No				0	na	na	na	na	na										
B	Environmental insects	No				0	na	na	na	na	na										
F	Low density [CE]	No				0	na	na	na	na	na										
F	Average density [CE]	No				0	na	na	na	na	na										
F	High density [CE]	Yes	3	2	1	6	YES	YES	NO	YES	NO	oPRP	Metallic [CE] removed by way of magnets	4500 gauss	Shift cleaning	Production chart					
B	Crawling insects	Yes	1	1	1	1	YES	NO	NO	NO	NO		Minimum turnover 10 days avg 4 days								
B	Flying insects	Yes	1	1	1	1	YES	NO	NO	NO	NO		Minimum turnover 10 days avg 4 days								
M	Molds Yeasts	Yes	2	1	1	2	YES	NO	NO	NO	NO		Minimum turnover 10 days avg 4 days								
						0															

Specific Aspects	CCP	CP	oPRP
WHAT	Critical Control Point	Control Point	Operational Prerequisite
WHERE	Product flow	Product flow	Product flow
Systematically = 100% of product	YES	NO	YES
ELIMINATION of hazard	YES	NO	Not Applicable
REDUCTION of hazard	Not Applicable	YES	YES
MEASURE highlight hazard	Not Applicable	YES	YES
Associated monitoring aims to	Assess the presence of risks in the product / Assess efficiency & efficacy of killing point	Directly measure severity of hazard	Verify proper operating conditions + result of any operations carried out
Limit exceeded = NC product	YES	YES	Not Applicable
Logging mandatory	YES	YES	Not Applicable
Logging of NC product decisions mandatory	YES	YES	To be verified

PRP	QCP
Prerequisite	Only qualitative aspects
Lack of product	Product flow
Not Applicable	YES
Not Applicable	YES
Not Applicable	Not Applicable
Not Applicable	Not Applicable
Verify operating conditions before beginning the process	Measure entity of any risk factors
NO	YES
NO	YES
Not Applicable	YES

Type	Family	Specific List
A	Allergens other than gluten	Soy
		Milk protein
		Shellfish, Fish, Mollusks
		Egg
		Peanuts
		Nuts
		Sesame
		Mustard
		Celery
		Sulfur Dioxide
		Lupins
G	Gluten (Specific allergens)	**Gluten**
B	Biological	CRAWLING insects
		FLYING insects
		Environmental insects (mosquitoes, stink bugs, wasps)
		Rodents (rats, mice, field mice)
		Birds (pigeons, turtle doves)
C	Chemical	Agrochemicals (herbicides, fungicides, insecticides)
		Acrylamide
		Alkaloids
		Ash
		Mycotoxins - Aflatoxins
		Mycotoxins - Ochratoxin A
		Zearalanone
		[DON]
		HeMe - Cadmium
		HeMe - Lead
		HeMe - Arsenic (Inorganic out of the total)
		HeMe - Mercury
		HeMe - Iron
		Other Heavy Metals (Cu, Sn, Sb, Zn)
		Mineral oils (MOSH and MOAH)
F	Physical	HIGH DENSITY [CE] (greater than product as it is being assessed)
		AVERAGE DENSITY [CE] (similar to product as it is being assessed)
		LOW DENSITY [CE] (lower than product as it is being assessed)
M	Microbiological	Mold
		Yeast
		Salmonella
		Escherichia coli
		Heat-sensitive Load
		Heat-resistant Load
O	Genetically Modified Organisms	GMO rice where applicable and any other genes, incl. by genetic drift
Q	Qualitative	Water Activity (aW) - causal relationship with M
		Organoleptic Properties
		Product state and/or form (granulometry, solid, liquid, gas)
		Recipe Ingredients
V	Authenticity	Matches specifications (legal name of the product)
		Title, Concentration (for functional ingredients)
		Product identification (Variety, Species)
		Authenticity of Origin
L	Legality (except as above)	Documentation and/or formal prerequisites (e.g. organic)
		Proper Labeling (ID, tracking)

Requirements	Expected response	Allergens
Over the last five years, have there have been (FDA, RASFF) warnings concerning the product under consideration for this hazard?	NO	
Are there any known product recalls by companies related to the product concerned for this hazard (outside of the warning systems)?	NO	
Are there any documented cases of awareness efforts by the media related to the product considered (or for the same category of products) for this hazard?	NO	
Is there a dilutive and/or “cleaning” effect as a result of the production process?	YES or Not Applicable	
Is there a concentration effect as a result of the production process?	NO or Not Applicable	
Are there any known national and/or Community legislation proposals on MRLs or guidelines for the hazard related to the product considered?	NO	
In the event of ALLERGENS, presence declared on the label		YES or Not Applicable

Parameter	High = 3	Average = 2	Low = 1
SEVERITY (S)	Indicates that the hazard, when present at the level expected, can result in severe and immediate (acute) harm to the consumer or otherwise represents a serious violation of the law or of quality policies.	Indicates that the hazard, when present at the level expected, can result in non-severe, non-immediate (e.g. cumulative) harm to the consumer; the hazard could result in product degradation.	Indicates that the hazard has never been encountered or, if encountered and for the expected level of presence, the hazard cannot result in either harm to the consumer or a reduction in the product's commercial value.
PROBABILITY (P)	If, based on an assessment of available data or on other evidence / warnings, a recurrence of the hazard is deemed highly probable.	If, based on an assessment of available data or on other evidence / warnings, a recurrence of the hazard is deemed somewhat probable.	If, based on an assessment of available data or on other evidence / warnings, a recurrence of the hazard is not deemed probable.
EXPOSURE (E)	For the phase considered and as a result of applicable efforts to control / measure the hazard: a) maximum elimination action - b) maximum hazard measurement	For the phase considered and as a result of applicable efforts to control / measure the hazard: a) elimination action not possible - b) hazard measurement is possible	For the phase considered and as a result of applicable efforts to control / measure the hazard: a) elimination action not possible - b) hazard measurement is possible but not very representative
S x P x R	**Greater than 18**	**Greater than 6 and less than or equal to 18**	**Less than or equal to 6**
	The level of food-safety risk requires the application of measures aimed at intercepting and reducing the risk to acceptable levels.	The level of food-safety risk does NOT require the application of systematic measures aimed at intercepting and reducing the risk to acceptable levels, but monitoring is recommended in order to prevent any "drift".	PRP / oPRP = The risk is *de facto* managed by way of "environmental" and/or pre-operational preventive measures or by ongoing action carried out throughout the process that is sufficient to maintain the current level of safety; the resulting level of risk does not require any further measures.
			Less than 3
			The risk does not require specific handling because it does not reach an adequate level of importance. The system is required to provide confirmation by way of a DECISION-TREE assessment.

	Procedure Title: **Vendor Qualification**		Procedure Code: **PQ.06.01**
	Issued by QA:	Reason for revision: - Added forms Modsq15.A and Mosq15.B	Revision no.: 10 / Date: 07-Jul-2015
	Approved by CEO:		First issued on: 10-Mar-98

OPERATING INSTRUCTIONS	
Code	**Instruction Title**

FORMS / ANNEXES	
Code	**Form Title**
NS	Paddy data (AS400)
Modsq 48.1	Vendor Qualification Questionnaire
Modsq111	Food Risks Questionnaire
	Packaging Supplier List and Assessment
Modsq 13	List - Raw Material Suppliers Assessment
Modsq 15.A	Packaging list
Modsq 15.B	List of packaging from vendors

PURPOSE – APPLICABILITY

The process described in this Operating Procedure concerns the assessment and monitoring of the suppliers of raw materials and of products purchased by the Company.

INPUTS, OUTPUTS AND INTERACTIONS

Inputs	*Outputs*	*Interactions*
- Need to select new vendors while maintaining the high price-to-quality ratio of procurements. - Need to maintain the capacity of vendors to meet demand over time. - Need to find new and better procurement sources.	List of vendors considered suitable for the Company based on objective qualification and qualification-maintenance parameters.	This process interacts with all other processes developed by the Company, both within and outside of the Raw Materials Procurement Office.

Phase	Description	Supervisor Assigned	Registration or reference documents
Qualification and Assessment of Paddy and Organic Paddy Vendors	a) CONVENTIONAL PADDY RICE → ✓ Given the vast number of paddy suppliers (single farmers, farmer associations, intermediaries, etc.) distributed widely throughout the territory, the qualification of such vendors is done by systematically evaluating the product provided. Each paddy supplier is qualified and assessed on an ongoing basis based not so much on their technical and organizational capabilities, but rather on the basis of the quality of the product provided at any given time based on the results of controls conducted as each supply arrives (see PQ.10.01 Controls upon receipt). ✓ In the event of incoming product that does not meet the specifications agreed upon with the vendor (by contract), the paddy Purchasing Manager shall decide whether to qualify or downgrade the product and, consequently, the vendor. ✓ Vendors whose products do not meet required qualification parameters are excluded from the procurement process and their products are rejected. ✓ The list of Qualified Vendors of "Conventional" paddy rice is available in the AS/400 information system ("Paddy data") and is periodically updated by the paddy Procurement Office. b) ORGANIC PADDY RICE → ✓ A fundamental prerequisite for the qualification of a new organic vendor is possession of a certification of conformity of organic production (as per Regulation 834/2007) issued by a recognized and accredited certification body. ✓ For this reason, as well as for the size and number of organic farms, Riso Scotti does not conduct audits/inspections in the field, given that we deem the thorough controls conducted by the certification body to be sufficient. ✓ The assessment process fully mirrors the process described for conventional paddy; however, in addition to the specified controls upon receipt, the documentation requirements of Reg. 889/2008, as described in the procedure PQ10-01- Product Controls Upon Receipt [PQ10-01- Controlli Prodotti in Accettazione.doc].	Paddy Procurement Manager	Paddy data (AS400)

Phase	Description	Supervisor Assigned	Registration or reference documents
Qualification and Assessment of Packaging Suppliers	For primary packaging material suppliers - rolls and packs: a) qualification is done once every 3 years by way of: ✓ fact-finding audits by the Quality Assurance unit ➢ filling out and submitting the form Modsq 48.1 – Vendor Qualification Questionnaire [Modsq 48.1 - Questionario di Qualificazione Fornitori]; ➢ systematic evaluation of the qualification questionnaires received using the spreadsheet Modsq 48.1b – Vendor Qualification Questionnaire – assessment calculation.xls [Modsq 48.1b - Questionario di Qualificazione Fornitori - calcolo valutazione.xls]; ➢ submitting the forms for the declaration of conformity for contact with food for primary packaging specific to the foodstuffs with which it will come into contact: Modsq48.A Risotti Dry Packaging Questionnaire [Modsq48.A Questionario packaging Risotti Dry]; Modsq48.B Vacuum-packed Rice Packaging Questionnaire [Modsq48.B Questionario packaging Riso sottovuoto]; Modsq48.C Rice Packaging Questionnaire [Modsq48.C Questionario packaging Riso]; Modsq48.D Risotti Rapid Packaging Questionnaire [Modsq48.D Questionario packaging Risotti Rapid]; Modsq48.E Paper Bag Packaging Questionnaire [Modsq48.E Questionario packaging Sacco carta]; Modsq48.F Sauces Packaging Questionnaire [Modsq48.F Questionario packaging Salse]; Modsq48.G Raffia Packaging Questionnaire [Modsq48.G Questionario packaging Rafia]; ➢ submitting the form Modsq15.B - List of packaging from vendors [Modsq15.B - Elenco imballi da fornitori], in which each vendor lists all products sold and establishes a clear connection between the composition of the packaging and the related technical specifications. Once all the forms have been received from the various vendors, QC collates all the information in the summary form Modsq15.A - Packaging List [Modsq15.A - Elenco imballi]; ✓ sampling (flexible packaging material, in spools) ➢ the Procurement Manager requests that the vendor provide 500 kg (approx.) of material for evaluation by the Maintenance Manager; ➢ in the event of approval (positive outcome of machinability testing), the Procurement	QAM Procurement Manager	✓ Modsq 48.1 - Vendor Qualification Questionnaire [Modsq 48.1 - Questionario di Qualificazione Fornitori] ✓ Modsq 48.1b - Vendor Qualification Questionnaire - assessment calculation.xls [Modsq 48.1b - Questionario di Qualificazione Fornitori - calcolo valutazione.xls] ✓ Modsq15.B - List of packaging from vendors [Modsq15.B - Elenco imballi da fornitori] ✓ Modsq15.A - Packaging list [Modsq15.A - Elenco imballi] ✓ Modsq48.A Risotti Dry Packaging Questionnaire [Modsq48.A Questionario packaging Risotti Dry] ✓ Modsq48.B Vacuum-packed Rice Packaging Questionnaire [Modsq48.B Questionario packaging Riso sottovuoto] ✓ Modsq48.C Rice Packaging Questionnaire [Modsq48.C

Phase	Description	Supervisor Assigned	Registration or reference documents
	Manager requests an industrial sample; ✓ approval of the industrial sample ➢ approximately 1,000 kg of flexible material and about 10,000 packs are subjected to further industrial testing and evaluated by the Maintenance Manager; ➢ if the test batch passes the tests, the Procurement Manager is authorized to begin standard provisioning with the vendor concerned; ➢ if the batch fails the tests, the Procurement Manager has the option to end relations with the new vendor or request another sample. The list of approved suppliers of packaging material is formalized in the file **List and Assessment of Packaging Suppliers** [**Elenco e valutazione Fornitori imballi**] and is updated annually. b) Existing suppliers of packaging material are evaluated by the Procurement Manager by assessing the quantity of defective/non-compliant packaging material found during controls conducted upon receipt or during its use in production. This quantity is expressed as a ratio to the quantity provided throughout the year by each vendor in order to calculate a non-compliance index (%). This index must not exceed the level set by the Procurement Manager for each type of packaging material considered. The result of this assessment and the thresholds are specified for each material and for each vendor in the file Non-compliance aaaa [Non conformità aaaa] in the folder ..\L - Vendors\Packaging [..\L - Fornitori\Imballi]		Questionario packaging Riso] ✓ Modsq48.D Risotti Rapid Packaging Questionnaire [Modsq48.D Questionario packaging Risotti Rapid] ✓ Modsq48.E Paper Bag Packaging Questionnaire [Modsq48.E Questionario packaging Sacco carta] ✓ Modsq48.F Sauces Packaging Questionnaire [Modsq48.F Questionario packaging Salse] ✓ Modsq48.F Sauces Packaging Questionnaire [Modsq48.F Questionario packaging Salse]; ✓ Modsq48.G Rafia Packaging Questionnaire [Modsq48.G Questionario packaging Rafia] ✓ **Packaging Supplier List and Assessment [Elenco e valutazione Fornitori imballi]**

Claudio Innocenti

Phase	Description	Supervisor Assigned	Registration or reference documents
Qualification and Assessment of suppliers of other ingredients / raw materials	For suppliers of raw material other than paddy, ingredients and additives, the following parameters apply: a) Qualification by way of ✓ **SAMPLING**→ Vendors of raw materials are selected based in part on a preliminary assessment of samples of the products they provide along with related technical specifications ➢ After the sample has passed this test, and based on the information provided in the technical specifications, R&D approves the raw material and the related vendor and reports this to QA and to the PM; ➢ Once in possession of the technical specifications of the approved material, the QAM updates the file List of Raw Materials [Elenco Materie Prime]; ✓ Vendors approved as an exemption from the qualification procedures described below as a result of the positive assessment of the sample is said to be "Qualified based on Preliminary Sample" (PS). This qualification will need to be supplemented with one or more of the actions described below. ✓ **QUALIFICATION QUESTIONNAIRE** → Preliminary data about the Vendor must be gathered by way of informational Qualification Questionnaires sent by QA directly to the producer or to an intermediary / agent / importer. Based on the responses to the questionnaires, with regard to sufficient "guarantees", such as: ➢ adequate systems to manage product salubrity (including aspects related to potential allergens); ➢ a certified quality system; ➢ satisfactory organizational prerequisites (e.g. ability to conduct controls, issue declarations of conformity of provisions, etc.); ➢ existence of a code of conduct based on the provisions of the SA8000 ethics standard. A vendor shall be deemed Qualified with regard to the qualification questionnaires: Modsq48.1 - Vendor Qualification Questionnaire [Modsq48.1 - Questionario di	QAM R&D PM	✓ Raw Materials List [Elenco Materie Prime] ✓ Modsq48.1 - Vendor Qualification Questionnaire [Modsq48.1 - Questionario di Qualificazione Fornitori] ✓ Modsq111 - Food Risks Questionnaire [Modsq111 - Questionario Rischi Alimentari] ✓ List - MP vendor assessment (Modsq 13) [Elenco - valutazione fornitori MP (Modsq 13)]

Phase	Description	Supervisor Assigned	Registration or reference documents
	Qualificazione Fornitori] and Modsq111 - Food Risks Questionnaire [Modsq111 - Questionario Rischi Alimentari] Suppliers of minor raw materials / ingredients may also be qualified by way of questionnaires completed in advance by the vendor, subject to verification and approval by QC ✓ **HISTORICAL KNOWLEDGE** → In addition to completing the questionnaires, qualification may take place based on information gathered as follows: ➢ Systematic conformity of previous provisions, when such evidence is backed by a sufficient series of cases (existing vendors); ➢ Existence of a quality management system certified based on ISO 9001:2008 / BRC / IFS standards by recognized bodies; ➢ Ability to respond to specific requests (e.g. documentation requests for GMOs, mycotoxins, allergens, etc.) In all of the cases above, such vendors are deemed to be qualified based on "Historical Knowledge" (HK); ✓ **AUDITS** → Based on specific needs / opportunities for preliminary qualification and/or requalification (in the event of critical NC or loss of qualification), audits of the vendor's facilities may be planned and conducted. Given that this is an activity that is only conducted under "critical" circumstances, it is not something that is currently planned. ➢ These audits may be conducted by: • RISO SCOTTI personnel; • the personnel of RISO SCOTTI customers; • other bodies appointed for the purpose by RISO SCOTTI. ➢ Audit reporting is to take place in the specific feedback list and related spreadsheet List - RM vendor assessment (Modsq 13) [Elenco - valutazione		

Phase	Description	Supervisor Assigned	Registration or reference documents
	fornitori MP (Modsq 13)] In such cases, if the vendor meets the organizational prerequisites specified above, they are said to be qualified by "Audit" (AU). b) Requalification by QAM as follows: ✓ Conformity assessment of provisions from the previous year, calculated as non-compliant provisions / total provisions (%), where such evidence is supported by a sufficient series of cases (existing vendors); ✓ Assessment of service level (e.g. timeliness, flexibility in quantities, etc.); ✓ Assessment of willingness to provide information (e.g. technical specifications, test reports, etc.) and response times. ✓ Etc. The outcome of this annual assessment is formalized by QA in the file List - RM vendor assessment (Modsq 13) [Elenco - valutazione fornitori MP (Modsq 13)].		
Qualification of diversification vendors	Diversification vendors are those businesses and other partners to which we intend to entrust with the production of "outsourced process" products under the Scotti trademark based on certain technical specifications. We distinguish between: a) Suppliers of CONVENTIONAL products → For all diversification products, specific technical specifications and related annexes have been prepared to ensure the conformity of provisions. ✓ Given that SCOTTI is ultimately responsible for the quality of the final product, the Procurement Office verifies, at the time of qualification, that the vendor is able to ensure that the processes outsources are subjected to the same level of control that is applied to the internal processes within Scotti S.p.A. b) Suppliers of ORGANIC products → A fundamental prerequisite for qualification is possession of a certification of conformity of organic production, as per Regulation 834/2007, issued by a recognized and accredited certification body. ✓ Riso Scotti does not conduct audits in that we deem the thorough controls conducted by the certification body to be sufficient.	QA	Technical Specifications

Claudio Innocenti

Phase	Description	Supervisor Assigned	Registration or reference documents
	✓ For organic products, the controls upon receipt as described above for diversification products must be supplemented by verification of the documentation requirements of Reg. 889/2008.		
Services provided by external specialist firms	The following activities fall within this category: ▪ Janitorial services ▪ Analysis laboratories ▪ Pest-monitoring services The Procurement Office qualifies service providers and enters them into the AS/400 information system (vendor data). In order to be included as an external specialist service provider, the Quality Assurance unit will also ask that these providers be in possession of specific certification for their industry, such as: SINAL certification for analysis labs; SIT certification for sample weights used to calibrate instrumentation, etc.	PM	AS/400 information system (vendor data).
Transport Providers	Providers of transport services are selected by way of interviews of the service firm by the logistics manager. Transporters are selected based on the following parameters: ❑ Availability of vehicle fleet ❑ Existence of insurance for goods traveling to specific geographical areas ❑ Price (compared to the market average) ❑ Timeliness of deliveries ❑ Vehicle cleanliness ❑ Handling of the return of information (hard copy or otherwise)	Logistics Manager	
Performance assessment for non-food vendors	Based on information gathered and on any non-compliance reported, the Procurement Manager conducts annual assessments of whether or not to renew vendor qualifications and does so following the procedures described above.	PM	
Filing	The function responsible for the qualification / assessment process for vendors in the categories described above shall ensure that all documentation produced is properly filed and undertakes to keep such documentation archived for at least 24 months.	All functions	✓ Function archives ✓ Quality Server

Phase	Description	Supervisor Assigned	Registration or reference documents
Distribution list	See MODSQ10	QA	Modsq10

Category	Parameter	UM	LMR	Attention level	Legislation	Guideline
Merceological aspect	Broken	%	**Technical agreement**	Not Applicable	National (Italian)	Not Applicable
	Defect	%		Not Applicable		
Autenticity	Origin	Place	**Confirmed**	Not Applicable	Claims	Not Applicable
	DNA	%	**Conforme**	93,00	Claims	Basmati COP
Stability	Moisture	%	**15,00**	14,50	National (Italian)	CODEX STAN RICE
	aW	Value	**0,60**	0,60	Not Applicable	Not Applicable
GMO	CAM 35s	Presence	**Positive**	Not Applicable	CE 1829/2003	CE 787/2004 sampling
	T Nos	Presence	**Positive**	Not Applicable		
Heavy metal	Cadmium	mg/kg	**0,20**	0,10	CE 1881/2006	CE 333/2007 sampling
	Lead	mg/kg	**0,20**	0,10		
	As Ino milled rice	mg/kg	**0,20**	0,10	CE 1006/2015	
	As Ino Brown & PRB	mg/kg	**0,25**	0,15		
	Mercury	mg/kg	**0,01**	Not Applicable	CE 73/2018	
Micotoxins	Afla B1	µg/kg	**2,00**	1,00	CE 1881/2006	CE 401/2006 sampling
	Afla B1+B2+G1+G2	µg/kg	**4,00**	2,00		
	Ocratoxin A	µg/kg	**3,00**	1,50		
Pesticides	Herbicides	mg/kg	**LMR**	50% LMR	CE 396/2005 - CE 299/2008 (CE 839/2008 - CE 239/2009) CE 983/2017 - CE 1107/2009	ISPRA 1/TTA/09 uncertainty - CE 657/2002 interpretation
	Fungicides	mg/kg				
	Insecticides	mg/kg				
	Adjuvants	mg/kg				

Product	Paddy rice		Milled rice		Milled rice	
Origin	Italy		Italy		Non UE	
Supplier	Farmer		External producer		External producer	
	Frequency	Responsability	Frequency	Responsability	Frequency	Responsability
Autenticity	Buono ENR	Ente Risi	Buono ENR	Ente Risi	1 Batch	Supplier
Stability	1 Truck	Riso Scotti	1 Truck	Riso Scotti	1 Batch	Riso Scotti
Merceological aspect	1 Truck	Riso Scotti	1 Truck	Riso Scotti	1 Batch	Riso Scotti
GMO	1 Year	Riso Scotti	1 Batch	Fornitore	1 Batch	Fornitore
Heavy metal	6 Months	Riso Scotti	1 Batch	Fornitore	1 Batch	Fornitore
Micotoxins	1 Year	Riso Scotti	1 Batch	Fornitore	1 Batch	Fornitore
Pesticides	6 Months	Riso Scotti	1 Batch	Fornitore	1 Batch	Fornitore

Audit Report

Global Standard for Food Safety Issue 8: August 2018

1.Audit Summary			
Company name	Riso Scotti SpA	Site Code	1151222
Site name	Riso Scotti SpA		
Scope of audit	Production of rice and parboiled rice (parboiling process also in outsourcing), vacuum packed and not, in plastic or in bulk. Production of pre-cooked rice products in plastic bags. Production of drinks based on soy, rice and cereals in Tetra Pak and in bulk. Milling of rice flour packed in paper bags, big bags and in bulk. Production of rice snacks and cakes, packaged in plastic film. Production of dehydrated risotto, packaged in MA in plastic bags. Including off-site storage in via Veneroni. Produzione (pilatura ed eventuale parboilizzazione anche in outsourcing) di riso confezionato sottovuoto e non, in sacchetti in plastica o sfuso. Produzione (miscelazione, cottura, sgrondatura, confezionamento e sterilizzazione) di prodotti a base di riso precotto e altri ingredienti confezionati in sacchetti di plastica. Produzione (estrazione, filtrazione, eventuale aggiunta di altri ingredienti, sterilizzazione) di bevande a base di soia, riso e cereali confezionati in Tetra Pak e sfusi. Molitura di farina di riso confezionata in sacchetti di carta, big bag e sfusa. Produzione (impasto, soffiatura, estrusione, eventuale cottura) di prodotti da forno e snack di riso confezionati in film plastico. Produzione di risotto disidratati miscelati con altri ingredienti e confezionati in MAP in sacchetti di plastica. Il campo di applicazione comprende lo stoccaggio fuori sede in via Veneroni (PV)		
Exclusions from scope	Traded goods		
Justification for exclusion	Products only traded by the site.		
Audit Finish Date	2020-06-05		
Re-audit due date	2021-06-17		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
Choose a module	Choose an item		
Choose a module	Choose an item		

Head Office	No

2. Audit Results

Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	A	Previous audit date	2019-06-10		
Certificate issue date	2020-07-17	Certificate expiry date	2021-07-29		

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

3.Company Details

Address	Via Angelo Scotti, 2 - 27100 Pavia		
Country	Italia	Site Telephone Number	+39 0382 5081
Commercial representative Name	Gian Luca Pesce	Email	pesce@risoscotti.it
Technical representative Name	Marco Zaninello	Email	zaninello@risoscotti.it

4.Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	4-6
Shift Pattern	3				
Subcontracted processes	Yes				
Other certificates held	IFS v6 – Organic – Kosher – Fairtrade – Gluten free				
Regions exported to	Europe North America Asia				

4.Company Profile

	Oceania South America None
Company registration number	na
Major changes since last BRC audit	completion of the UHT department

Company Description

Company founded in 1860, Sito was built in 2001. Products made: 1) white and parboiled rice packaged under vacuum and not, (paddy cleaning, parboiling and drying (only for parboiled rice), de-boiling, elimination of green grain, stone removal , whitening, brushing, classification, polishing, selection, packaging) 2) product based on micro-stable rice with various ingredients packaged in an envelope, storage of raw materials, preparation of the saline solution, dosing and mixing of ingredients, filling of bags, sterilization, cooling, washing and secondary packaging. 3) preparation of dehydrated rice envelopes which involves: further drying of the rice, packaging with other ingredients (vegetables, mushrooms, etc.) in an envelope, secondary packaging. 4) vegetable drinks: maceration, grinding, cooling, degassing, homogenization, sedimentation, centrifugation, cooling, UHT treatment, aseptic homogenization, aseptic packaging Tetrapack ,. 5) rice snacks are: "rice cakes", "crocs with rice and corn", produced by blowing, extrusion and packaging. An outsourcing phase is envisaged with the parboilization process carried out in part at a historical supplier company due to insufficient self-production. There are products marketed under the company brand: baked goods (biscuits, plum cakes and rice wafers), rice oil, rice paste, spreadable cream excluded from the field of application.
Daily site productivity: 250 tons - Parboiled: 200 tons - vegetable drinks 150,000 liters - "quick cooking" rice 20,000 pieces - dry risotto: 30,000 pieces - crackers and snacks: 50,000 pieces. for a total turnover of 215 mil €. The company produces its own brand and private label. No recall in 2019. The company meets the requirements for the use of the BRC logo. Contact person in case of emergency: Marco Zaninelli (tel. +39.335.5778596 fax. +39 0382.577265 mail zaninelli@risoscotti.it). No seasonal interruption

Azienda fondata nel 1860, Sito è stato costruito nel 2001. Prodotti realizzati: 1) riso bianco e parboiled confezionato sotto vuoto e non, (pulizia del risone, parboiling ed essiccazione (solo per riso parboiled), sbramatura, eliminazione della grana verde, spietratura, sbiancatura spazzolatura, classificazione, lucidatura, selezione, confezionamento) 2) prodotto a base di riso microondabilie con ingredienti vari confezionato in busta, stoccaggio di raw materials, preparazione della soluzione salina, dosaggio e miscelazione degli ingredienti, riempimento delle buste, sterilizzazione, raffreddamento, lavaggio e imballaggio secondario. 3) preparazione buste di riso disidratato che prevede: essiccazione ulteriore del riso, confezionamento con altri ingredienti (verdure, funghi ecc) in busta, imballaggio secondario. 4) bevande vegetali: macerazione, macinazione, raffreddamento, degasaggio, omogeneizzazione, sedimentazione, centrifugazione, raffreddamento, trattamento UHT, omogeneizzazione asettica, confezionamento asettico Tetrapack,. 5) snack di riso sono: "gallette di riso", "crocs con riso e mais", prodotto mediante soffiatura, estrusione e confezionamento. Prevista una fase di outsourcing con il processo di parboilizzazione realizzato in parte presso azienda fornitrice storica a causa della insufficiente autoproduzione. Ci sono prodotti commercializzati a marchio aziendale: prodotti da forno (biscotti, plum cake e wafer di riso), olio di riso, pasta di riso, crema spalmabile esclusi dal campo di applicazione.
Il sito presenta un'autorizzazione sanitaria rilasciato dall'Ufficio Sanitario ASL di Pavia, con il numero di omologazione 30 / PV del 24.01.2005, successivamente aggiornato il 06.05.2009 (Dichiarazione di inizio attività produttive) per il nuovo dipartimento “Rapido”, protocollo numero 1959 / 09 e il 10.05.2011 per il dipartimento delle bevande vegetali protocollo numero 2685/1. La produttività giornaliera del sito: 250 ton - Parboiled: 200 ton - bevande vegetali 150.000 lt - riso a "rapida cottura" 20.000 pz - risotti dry: 30.000 pz - gallette e snack: 50.000 pz. per un fatturato totale di 215 mil €. L'azienda produce a marchio proprio e a marchio del distributore Nessun richiamo nel 2019. La società soddisfa i requisiti sull'uso del

4.Company Profile

logo BRC. Persona di contatto in caso di emergenza: Marco Zaninelli (tel. +39.335.5778596 fax. +39 0382.577265 mail zaninelli@risoscotti.it). Nessuna interruzione stagionale Produzione al momento dell'audit: ricezione del risone di Az. Agr. Tosone Pier Carlo, trasportato da Italtrasporti; Confezionamento riso Arborio (commessa 533); Visto lavorazione in riseria parboiled del 04.06.2020, verificato processo di ammollo in acqua di rete a perdere a 69-71°C, cottura a 115°C e controlli di linea sul processo di gelatinizzazione; Visto il confezionamento del riso parboiled a marchio Scotti da 1 kg Riso Oro Gran Selezione L156A del 08/2022; Produzione di tubo di gallette da 150 gr a marchio Scotti RISO E MAIS L 05/12/20A; Produzione di tubo di gallette da 120 gr a marchio AMO ESSERE BIO del cliente EUROSPIN AI 5 CEREALI L 05/12/20A; Produzione di busta di triangoli riso e mais marchio Scotti Crock e Gusta L 05/12/20A; confezionamento reparto dry: risotto ai funghi e risotto al tartufo a marchio "Riso Scotti" in busta fda 210 gr; preparazione e confezionamento di riso "rapid" (miscelazione, confezionamento e sterilizzazione).

5.Product Characteristics

Product categories	07 - Dairy, liquid egg 15 - Dried food and ingredients 17 - Cereals and snacks 11 - Low/high acid in cans/glass
Finished product safety rationale	All ambient stable products. Dry products (rice, dehydrated rice bags, snacks): low water level (less than 14%); Drinks based on rice, oats or soy: subjected to UHT cycle (141.5 ° C for soy - 142.5 ° C for rice and oats all for a time of 15 "); not dry products: autoclave sterilization process (100 ° C for 50 'with peak at 124 ° C - F0> o = 4) Per prodotti "dry" (riso, buste di riso disidratato, snack): basso livello di acqua (inferiore a 14%); Bevande a base di riso, avena o soia: sottoposte a ciclo UHT (141,5°C per la soia - 142,5°C per il riso e avena tutti per un tempo di 15"); prodotti in busta sterilizzabili microondabili: processo di sterilizzazione in autoclave (100° C per 50' con picco a 124°C – F0>o =4)

High care	No	High risk	No	Ambient high care	No

Justification for area	non sono identificate aree AHC, HC o HR
Allergens handled on site	Milk Soya Cereals containing gluten Crustaceans Celery Fish Molluscs Sulphur dioxide and Sulphites Lupin

5.Product Characteristics	
	Sesame Nuts
Product claims made e.g. IP, organic	Vegetable drink gluten-free, lactose-free, with no added sugar, addition of vitamins and minerals, low fat content for microwaveable products, gluten-free and Organic products. Bevanda vegetale senza glutine, senza lattosio, senza zuccheri aggiunti, aggiunta di vitamine e minerali, basso contenuto di grassi per prodotto microondabili, gluten free e Bio (certificato Bioagricert)
Product recalls in last 12 Months	No
Products in production at the time of the audit	paddy rice reception; Arborio rice packaging; parboiled processing of 04.06.2020, parboiled packaging with 1 kg Scotti Riso Oro Gran Selezione L156A of 08/2022; Production of 120 gr gallette with the AMO ESSERE BIO of EUROSPIN customer WITH 5 CEREALS L 05/12/20; Production of rice and corn triangles Scotti Crock and Gusta L 05/12/20; packaging of mushroom risotto and "Riso Scotti" brand truffle risotto fda 210 gr; preparation and packaging of "rapid" rice ricezione del risone; Confezionamento riso Arborio; lavorazione parboiled del 04.06.2020, confezionamento parboiled a marchio Scotti da 1 kg Riso Oro Gran Selezione L156A del 08/2022; Produzione di gallette da 150 gr a marchio Scotti RISO E MAIS L 05/12/2020 e gallette da 120 gr a marchio AMO ESSERE BIO del cliente EUROSPIN AI 5 CEREALI L 05/12/20A; Produzione di triangoli riso e mais marchio Scotti Crock e Gusta L 05/12/20A; confezionamento risotto ai funghi e risotto al tartufo a marchio "Riso Scotti" fda 210 gr; preparazione e confezionamento di riso "rapid

6.Audit Duration Details			
On-site duration	28 man hours	Duration of production facility inspection	14 man hours
Reasons for deviation from typical or expected audit duration	Audit combined with IFS audit (4 total man days)		
Next audit type selected	Choose an item		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1	2020-06-04	0900	1800
2	2020-06-05	0900	1800

	Auditor (s) number	Name	Role
Auditor Number	052003	Giovanni Avaldi	Lead Auditor
Second Auditor Number	052020	Paolo Trucco	Auditor

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
IRICO ALESSANDRO - RGQ - qmm	X		X	X
REBECCA BOSCOLO – QA - qa	X		X	X
CARLO MONTI – QC - qc	X	X	X	X
GENNY PALMERI - QC -qc			X	
SAVI STEFANO - CAPOTURNO RAPID – Rapid Head shift		X		

Present at audit				
GIAMPAOLO LIZZI - RESP RAPID + DRY – Rapid		X		
MARCO BERTOLINO - RESP RICEVIMENTO RISONE – Paddy rice receiving responsabile		X		
MARCO MAGGI - RESP RISERIA RISO BIANCO – White rice production responsabile		X		
MARCO MAESTRI - RESP RISERIA PARBOILED – Parboiled production responsabile		X		
ROBERTO DE LUCA - CAPOTURNO CONF – Packaging head shift		X		
NICOLA FERRARACCIO - CAPOTURNO CONF – packaging headshift		X		
MARCO ROGNONI - RESP REPARTO GALLETTE – snacks dept. responsabile		X		

Non-Conformity Summary Sheet

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

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

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Major							

Minor							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	2.7.3	Non per tutti PRPO sono stati individuati i parametri di monitoraggio (limite o criterio di azione / frequenza / responsabilità del monitoraggio). Not all PRPOs have identified the monitoring parameters (limit or criterion of action / frequency / responsibility for monitoring).	Sono stati riesaminati tutti i piani di risk assessment con integrazione dei parametri mancanti. All risk assessment plans have been reviewed and missing parametrs added.	Per alcuni OPRP ripetitivi, non sono stati riportati i parametri su ogni riga. For some re-occurrent OPRPs, parameters had not been opportunely copied.	Rice cakes risk assessment copy	2020/06/29	G.Avaldi
2	3.5.4.1	Non sono stati documentati audit sul fornitore del Parboiled su risi colorati RISERIA PROVERA No audits have been documented on the Parboiled supplier of colored rice RISERIA PROVERA	Audit effettuato in data 17/06/20. Audit perfrmed on 17/06/20	Il rapporto e la presenza fisica presso il fornitore non aveva giustificato attività di verifica isepttiva. Continous relationship and physical presence on site did not justified	Riseria Provera audit report.	2020/06/29	G.Avaldi

				auditing activities.			
3	3.8.1	A fronte di diverse misurazioni del pH della bevanda di avena BIO (16%) a marchio VERSO NATURA superiori a 6.4 limite da specifica, non sono disponibili evidenze di gestione. No management evidence is available for various pH measurements of the organic oat drink (16%), VERSO NATURE branded.	L'analisi dei pericoli è stata integrata con la valutazione degli scostamenti sul pH relativi a risultati dei controlli. Risk assessment has been implemented by pH deviations evaluation for quality control results.	Sul prodotto bevande UHT, gli scostamenti rispetto al limite sono rilevanti per valori del pH inferiori ai valori di riferimento (segnale di instabilità). For UHT beverages, deviations against due range are relevant just for pH lower than limit range (stability indicator).	Reviewed risk assessment	2020/06/29	G.Avaldi
4	4.4.2	osservato la pavimentazione del soppalco dry in cattivo stato, inoltre il pavimento zona gallette ha la resina che si scrosta The flooring of the dry mezzanine was in bad condition, moreover the floor in the cake area has the resin that peels	Sostituzione pavimentazione metallica programmata entro 31/07/20 (lavoro appaltato). Il pavimento verrà levigato (30/06/20) per eliminare il rischio di scrostamento. Metal floor replacement (31/07/20) has been contracted. Rice cakes floor will be smoothed before 30/06/20.	La manutenzione straordinaria del sito è stata sospesa per 4 mesi a causa della crisi COVID-19. High level site maintenance has been delayed fro 4 months due to COVID-19 crisis situation.	Contract copy and picture for smoothed floor.	2020/06/29	G.Avaldi
5	4.6.1	osservate coperture in cattivo stato (coperture degli ingredienti reparto dry oppure chiusura in cartone in cattivo stato per la vasca di materia prima linea gallette),	Coperture ingredienti riparate; vasca linea gallette sostituita con nuovo cassone; motori protetti con carter. Covers for ingredients have been fixed; new box provided	La manutenzione straordinaria del sito è stata sospesa per 4 mesi a causa della crisi COVID-19. High level site	Fixed cover; replaced box; proofed engines.	2020/06/29	G.Avaldi

		inoltre vengono osservati due motoriduttori della linea triangoli insistere sulle tramogge senza carter. Per quanto visto la sicurezza del prodotto non risultava compromessa. Observed roofs in poor condition (roofing of ingredients in the dry department or cardboard closure in bad condition for the raw material tank of the biscuits line), also two gearmotors of the triangles line are observed insisting on the hoppers without casing. As seen, the product safety was not compromised.	for rice cakes raw materials. Both engines proofed.	maintenance has been delayed fro 4 months due to COVID-19 crisis situation.			
6	4.7.3	Utilizzo di nastro adesivo trasparente per riparazioni temporanee (visto per interruttore posto sull'autoclave) oppure utilizzato per tenere in posizione i tubi Use of transparent adhesive tape for temporary repairs (seen on switch placed on the autoclave) or used to hold the pipes in position	Riparazioni temporanee sistemate il giorno successivo a fine audit (sabato 06/06/20). Temporary repairs fixed on day after audit end (Saturday 06/06/20).	Gli interventi di sistemazione delle riparazioni temporanee erano previsti il sabato mattina. Fixing ofr all temporaty repairs is planned on Saturday morning.	Picures of fixed repairs	2020/06/29	G.Avaldi
7	4.9.6.1	previsto lo stoccaggio in sacchi delle miscele pronte al dosaggio, in questo caso	Realizzata istruzione operativa per la chiusura ed apertura corretta dei sacchi.	Le corrette modalità di chiusura e apertura non erano	Operative instruction	2020/06/29	G.Avaldi

		non viene definita una modalità di apertura in grado di prevenire eventuali rilasci di materiale di confezionamento (sacco o nastro di chiusura) provided for the storage in bags of the ready-to-dose mixtures, in this case an opening method that can prevent any release of packaging material (bag or closing belt) is not defined	Operative instruction has been provided for good practice for closing and opening bags.	formalizzate. No written evidence was present of good practice to close and open bag.			
8	4.11.2	non risultano pianificate le pulizie per le presse delle gallette, i nastri di trasporto del riso ammollato al cuocitore, canaline con cavi elettrici sopra le dosatrici confezionamento. cleaning for the presses of the biscuits, the conveyor belts of the rice soaked to the cooker, ducts with electric cables above the packaging dosing units are not planned.	Per tutti gli ambiti segnalati, viene fissata una frequenza minima di pulizia con priorità superiore a qualsiasi necessità operativa. For all reported areas, a minimum cleaning frequency has been fixed with priority against any operative need.	La frequenza di alcune pulizie è stata disturbata dall'eccezionale incremento di ordini a causa della crisi COVID-19. Cleaning frequences have been disturbed during COVID-19 crisis for exceptional orders intake.	Presses cleaning plan; packing lines cleaning instructions; parboiled plant cleaning plan.	2020/06/29	G.Avaldi
9	6.4.2	I conducimetri del CIP non sono tra gli strumenti sottoposti a taratura. CIP conductivity meters are not among the instruments subjected to calibration.	Pianificata taratura annuale con Tetrapak. Annual calibration planned with Tetrapak.	Per i conducimetri veniva effettuata calibrazione interna con pH metro. Internal calibration only, through pH	Updated calibration plan	2020/06/29	G.Avaldi

				meter, was planned.			

Comments on non-conformities
At the end of the audit nine minor findings emerge, in particular: The monitoring parameters (limit or criterion of action / frequency / responsibility of monitoring) have not been identified for all PRPOs. - No audits have been documented on the supplier of Parboiled on RISERIA PROVERA colored rice - In the face of different measurements of the pH of the VERSO NATURA branded ORGANIC oat drink (16%) above 6.4, which is the specification limit, are not available management evidence. - observed the dry mezzanine flooring in bad condition, furthermore the rice cakes area floor has peeling resin - observed roofs in bad condition (dry compartment ingredient covers or cardboard closure in poor condition for the raw material tank line), two gearmotors of the triangles line are also observed insisting on the hoppers without casings - Use of transparent adhesive tape for temporary repairs (seen for the switch placed on the autoclave) or used to hold the pipes in position - the mixtures are stored in bags ready for dosing, in this case an opening mode is not defined capable of preventing any release of packaging material (bag or closing belt) - cleaning for the cake presses is not planned, the conveyor belts to transport soaked rice to the cooker, conduits with electrical cables above the packaging dispensers. - The conductivity meters of the CIP are not among the instruments subjected to calibration.

Additional Modules / Head Office Non-Conformity Summary Sheet

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

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Root cause analysis and proposed action plan**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Root cause analysis and proposed action plan**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The Company has defined a policy, updated in 2016, which provides for the commitment to meet the requirements of hygiene and safety of production, customer satisfaction and the legality of the product: the policy is adequate to the company profile, declares in particular the commitment to reduction of energy consumption with the use of by-products (husk) to obtain energy. The content of the quality policy clearly delineates the company's commitment to achieve quality and safety objectives and to reduce complaints and NCs and achieve system efficiency improvements. Requirements are implemented: customer focus, environment, product requirements, process specifications; planned monitoring of the product delivered per day, investments to improve food safety and product quality. The system review process takes place annually and involves: internal audits, complaints analysis, customer satisfaction, process performance, corrective and preventive actions, continuous improvement, supplier evaluation, evaluation of the safety plan and the HACCP system, analysis of the objectives, last review of 05.08. 20. Several new investments defined for the year 2020 have been blocked due to the Covid emergency, the most important is the new Tetrapak line in the beverage department, other structural interventions (water purification system, energy production system, new warehouse, automatic palletizing system, white rice transport) are planned over a period of 5 years.

Defined objectives: reduce complaints, increase volume, reduce waste, reduce processing costs with investments such as transport of parboiled rice and greater storage. Company KPI one: product waste and returned products, both reached by the site. KPIs such as defective products, products sold and deliveries are less than in 2019, considering customer satisfaction. The evaluation of the progress of the objectives is carried out every two weeks together with the evaluation of the company KPIs (the second and fourth Friday of the month), last one: 05.29.20. Dissemination of the culture of quality: it is realized as an involvement of the staff in the company's performance and continuous conversation in production - defined as the "factory of ideas": identifying points for improvement in the department's operations, all evaluated by the quality and production function with the institution of monthly rewards. The company has a confidential reporting system to allow staff to report problems relating to the safety, integrity, quality and legality of the products, through the use of a personal mailbox, in the case of a communication, this is managed by a select committee made up of management or its representative, trade union representative, external consultant.

The plan following the non-conformities found during the previous certification audit was verified during this audit and effectively implemented.

1.2 Organisational structure, responsibilities and management authority

The Company has an organization chart updated on 03.07.19, following the change of the export manager, the roles are defined in Procedure PQ0101 rev 03.31.15, responsibilities and job description are defined. The job replacements are defined, such as the general manager is replaced by the Technical Director, while the Quality Manager is replaced by his staff. Employees are aware of their responsibilities as evidenced by the interviews during the audit. There are documented work instructions for all activities, which are available to employees.

2 The Food Safety Plan – HACCP

The company has developed a complete food safety plan, compliant with the Codex Alimentarius, a system update is underway due to compliance with the UNI EN ISO 22000 standard; the plan is developed considering a hazard analysis on all raw materials, semi-finished products and packaging materials; all the categories of finished products are included in the plan.
The HACCP team is multidisciplinary and involves the industrial manager, QA, maintenance, R&D, quality assurance personnel. The team leader is the industrial manager whose evidence of the November 2016 HACCP training is available.
The following prerequisites have been defined: Food defense, identification of work areas, structural characteristics, maintenance, cleaning, pest control, personal hygiene, purchasing, production, quality control, traceability, management of non-compliant products, allergens and GMOs, origin of products , identification of the physico-chemical characteristics that influence food safety. OPrP identified: pre-cleaning treatment, sieving, removal of ferromagnetic metals (magnets), stone removal, optical sorting.
The last update of the plan is 05/2020 for the introduction of the supply chain risk assessment (of the agricultural phase), the assessment of the hazards involves the raw material rice, ingredients, semi-finished products and packaging, evaluating the chemical, physical, microbiological hazards. Flow diagrams are available for: white rice, parboiled rice, rice packaging both under vacuum, MAP and in big bags, sterilized rice in bags and UHT drinks, seasoned rice in sterilized bags ("Rapid") and ready-made dishes. of dehydrated rice (dry), dated 11.21.18, last check of the flow diagrams carried out on 02.26.20.
Reception of raw materials and related controls, analysis of the finished product, cleaning practices are managed as PRP. The number of CCPs is manageable and periodically reviewed. Hazard analysis includes microbiological, chemical (including allergens) and physical hazards. The raw material hazard assessment identifies contamination from gluten-containing grains (allergens), foreign bodies, pesticide residues, heavy metal contamination, presence of GMOs, fraud and adulteration.
To assess the risk of individual hazards, the following are assessed: severity, probability and detectability by identifying the risk index with three values, if RI is> 18 the decision tree must be applied and the consequent CCP identified.
The CCPs identified are:
CCP for aflatoxins on incoming paddy rice (correlated with the humidity of the raw material), with critical limits of 14.5% humidity on each batch: each truck is sampled in 5 points, with control of defects in the internal laboratory on 3 kg of paddy rice. If the humidity is 15%, the trucks are blocked and QA makes a decision on the use or rejection of the batch. CCP final drying phase for humidity on parboiled rice: critical limits such as humidity below 15%, monitoring every hour and for each batch of dried parboiled, before sending it to the packaging storage silos. CCP for foreign bodies, detection managed by MD during the packaging phase of the entire rice line, critical limits of 3 mm and operating limits of the metal detector relating to the type of finished products, defined for each MD in the HACCP plan for packaging lines according to testers with different sizes, such as Fe 1.5 mm, 1.8 non Fe and 2.0 mm for stainless steel - for the product intended for microwave the limits are Fe 2.0 mm, 2.5 Stainless steel and non Fe 3 , 0 mm. On the "Rapid" line there is CCP metal detector before packaging with limits of 7 mm and operating limits with probes of 3 mm for steel and 2.5 mm for Fe and nonFe; other CCP: temperature above 100 ° C for 50 minutes, peak at 124 ° and cooling at 30 ° C, with recording of the sterilization cycle for each batch, the critical limits for the sterilization process are minimum F0 of 4, the process of sterilization is 50 'at a

temperature above 100 ° C, with release of the batch following the verification of stability in the oven - CCP on the dehydrated line: CCP present on rice (limits: 3 mm for steel and 2 , 5 mm for Fe and nonFe) and a neodymium magnet for the other ingredients - for the "rapid" and Dry line the monitoring frequency includes monitoring with hourly frequency CCP correlated to the UHT process with sterilization cycle, at 141.5 ° C for soy-based drinks and 142.5 ° C for rice-based drinks, in both cases for 15 ".
CCP on Puffy Rice (extruded): control of foreign bodies, by metal detector, positioned on the "open" product conveyor belt, with limits of 7 mm and operating limits for Fe, nonFe and Steel of 3 mm. A second metal detector is positioned before filling the packages with extruded products: the position of the CCP is due to the subsequent packaging in aluminized film, with evidence of detection by forming a double package, subsequently inspected by QC. The CPs for beverages are related to filtration for the removal of foreign bodies, the temperature in the storage tank for the product to be shipped in the tank and UHT. Other CPs mainly consist of filters, sieves, magnets, positioned along the production line and the hopper. The plan takes care of the risk assessment for newly formed products such as acrylamide, MCPD and Furans, mainly due to oil used as an ingredient for beverages: its assessment has led to consider it low risk. Last plan review: 05.08.20 during management review

2.7.3: Non per tutti PRPO sono stati individuati i parametri di monitoraggio (limite o criterio di azione / frequenza / responsabilità del monitoraggio).
Not all PRPOs have identified the monitoring parameters (limit or criterion of action / frequency / responsibility for monitoring).

3. Food safety and quality management system

3.1 Food safety and quality manual

The company has defined a Quality Manual, in revision 13 of June 2014, which describes the main processes and related procedures. Procedures and instructions are defined, including a document management procedure that contemplates the management of outdated documents. The documents are generally available at the points of use, available the list of documents approved in revision 06.03.2016 Production records are mainly in paper form.

3.2 Document Control

The procedure manages paper (few) and electronic documents. The process records are partly on paper and partly computerized: a progressive implementation of computerization of documents is in progress (X3). Security of IT documents: passwords for users who access reading or reading and editing. Data protection: updated antivirus and firewall, the system also manages external documents; periodic back up with internal saving on server (short-term storage) and in the cloud (for long-term storage).

3.3 Record completion and maintenance

"Document management" procedure PQ 05.1, is available for the management of the registers, which are kept for at least the shelf life of more than 1 year with respect to the shelf life of the products.

3.4 Internal audits

A procedure is in place (POI7 / 01) and an internal audit program. Complete internal audit on the FSMS by external consultant Luigi Bombardieri 1/22/19, 3/1/19, 4/12/19, 5/24/19, in 2020 already two meetings on 02.14.2020 and 02.26.2020 but not yet formalized on the report as it is currently incomplete. The Lockdown has blocked the internal audit activity which is about to restart. HLS ISO 22000 specific parts audit not yet performed. Sales manager as auditor conducting departmental inspections - sends emails with NC evidence and notes to CEO and management every morning. The following day, quality staff goes to the department to supervise the resolution of any problems. Viewed Internal inspection plan of the departments, The company has been divided into 7 departments (external area - Enal (cakes) - rice mills - packaging - warehouse - Underground warehouse - Beverages-Rapid. Each one is visited weekly by a team of 1 QC - 1 Commercial - 1 Head of Department. External area report seen on 04.17.2020 -

Parboiled rice on 03.13.20. Assessed Summary of internal audits 2019-2020:

found 112 NC of which 102 NC are closed. Ex. Rice mills 1/24/2020 ex. temporary repairs with scotch tape reported -> reported to maintenance. Documented summary on ModSq 05. Packaging: 10 kg packaging machine - broken door leaking.

AUDIT OR INSPECTIONS FROM CUSTOMERS:

Eurospin On 01.14.2020 for drinks: 26 findings emerged, of which 14 observations, 11 minor NCs (seen the changes to the personal hygiene procedure and related training), 1 critical NC relating to weight control (A lot of 23250 pieces received only 80 weighings). Assessed the closure of minor NC, while on the basis of a statistical validation study it has been shown that the probability of having values lower than T1 is <0.1%.

• Conad on 05.20.2020 for complaints on beverages

• Mars 04.28.2020 parboiled rice, remotely

• Bioagricert on 01.23.2020 for Organic

• AILI (Italian association for milk and intolerants) 02.11.2020

• Dubaev 02/11/2020 visiting agent

• Prison institution 02.12.2020 visit

• 02.14.2020 Austria Agents

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The supply process and the approval of suppliers are the responsibility of the purchasing department. This process is described in a specific procedure PQ.06.02 rev 9 of 01.19.2016 and managed accordingly. All currently qualified suppliers are historical and consolidated over time: the company policy is to rely on already qualified suppliers, a list of suppliers is available in rev 03.23.19 divided by product category (ingredients, frozen ingredients, primary and secondary packaging) and subject to periodic monitoring based on the supplier's compliance and service requirements provided; four levels of criticality of the material have been identified, in addition to hygienic and sanitary criticality, the purchase volume and the characterization of the recipe are considered. When strategic materials are purchased, such as paddy, a visit to the producer is foreseen, it should be specified that part of the paddy production is borne by one of the owners who frequently visits the production site, furthermore the supply chain project leads to direct contact between the paddy supplier and the company: the check upon receipt provides for the verification of the origin (the company works exclusively domestic rice), while milled rice is purchased from Italy or non-EU. The qualification of the single supply is envisaged through: authenticity (guaranteed by the document "Buono Ente Risi", stability, product category, GMOs, heavy metals, mycotoxins (humidity), pesticides, assessed receipt by supplier Soc. Agr. Bisagno Carlo "Buono Ente Risi" No.: 0101106263 (authenticity) - humidity 12.2% (product stability), other controls (GMOs, heavy metals, mycotoxins, pesticides) carried out on the basis of a sampling plan that takes into account the volumes withdrawn; assessed evaluation of the supplier HTS enology trader (supplier of enzymes Soufflet Biotechnologies: FSSC22000 certified company), qualification since 2010 - considered historical.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The checks on receipt are detailed in the PQ 10.01 procedure of 03.11.15, the raw materials, packaging, services are regularly inspected and analyzed to verify if they comply with the requirements of the orders. At the factory, checks are carried out on purchased materials to ensure that products comply with defined requirements and that the information is used in supplier evaluation.

3.5.3 Management of suppliers of services

The supply process and supplier approval are carried out by a purchasing department and described in a specific procedure PQ.06.02 rev 9, dated 01.19.2016 and managed accordingly. Service providers include balance calibration, maintenance service, laboratory services, transportation, cleaning, pest control, workwear laundry, outside consultant. The supplier's technician performs maintenance on the Sortex and Tetra Pak machine, as indicated in the service contract. Contract for cleaning service by PF, with a staff of 10 full time people.

3.5.4 Management of Out sourced processing

The company outsources part of the parboiling process to a historical supplier, Proveda, due to insufficient production capacity, even if the periodic checks carried out at the same supplier are not documented.

3.5.4.1: Non sono stati documentati audit sul fornitore del Parboiled su risi colorati RISERIA PROVERA
No audits have been documented on the Parboiled supplier of colored rice RISERIA PROVERA

3.6 Specifications

The specifications of raw materials and finished products are managed in the current version. Technical data sheets are available with specifications for all raw materials, processing aids and finished products, agreed with customers if necessary. Two specific products verified, with technical characteristics agreed with GDO. The parameters of quality and hygiene are considered. Verified analysis of raw materials such as risk and fraud. ASSESSED THE FOLLOWING SPECIFICATIONS FOR RAW MATERIALS:

• AEB supplier Endozym Glucael PW25 hydrolysis of beta glucans sent on 05.28.2018

• Supplier Emmefood RSAE-92 - Amylasi dated 02.25.2019.

• GI-BAKE supplier - Gluco Amilasi dated 04.21.2020.

• HTS (Soufflet) supplier - Amilase technical sheet 11.16.2018

• Speroni linoleic sunflower oil rev. 5 of 11.16.2018 Organic

• Tetrapack TBA200 basic technical data sheet including relative declaration of conformity dated 01.22.2019.

• technical data sheet of the tetrapack base Steampack caps including the relative declaration of conformity dated 01.22.2019.

FINISHED PRODUCT SPECIFICATION

CONAD SPECIFICATIONS REV. 1 DATED 01.15.2019 check the specifications of the packaging materials - seen the recipe - all references must be sterile. Each lot is inoculated on a Petri dish with a sample every 15 minutes, 7 days in the incubator the carton plus 3 the dish. If nothing grows, sterility is declared. Specifications report: Bacillus spp - Enterobacteria - lactobacilli - yeasts - molds <10 cfu Density - pH 5.4 - 6.4 and brix 11-13 ° C.

3.7 Corrective and preventive actions

The management of corrective actions (mod SQ 559 rev 0 of 05.30.19) provided for an evaluation of the action to be undertaken, execution and verification of effectiveness, seen from the CA management of 09.27.19 following a Conad "dark product" complaint, 'analysis has identified the cause in the recycling of the product at the packaging machine level, corrective action: limitation of possible recirculation ", verification of effectiveness: 11.06.19 (verified that after 90" the liquid is drained and that the product does not worsen in terms of organoleptic characteristics).

3.8 Control of non-conforming product

NC by product: Vegetable and Rapid drinks: for the non-compliant product, expected destruction, rice: a part is thrown away as vegetable waste (that which falls from the plant), intermediate waste (underweight, metal waste), as zootechnical waste. Processing waste (breaks and sub-caliber) transformed into flour (soy risk management). NC managed in 2019: 95 + 59 reports of products with pests (mainly complaints). System NC mainly concern audits (112), an improvement on the previous year (168) - see the chapter on audits.

3.8.1: A fronte di diverse misurazioni del pH della bevanda di avena BIO (16%) a marchio VERSO NATURA superiori a 6.4 limite da specifica, non sono disponibili evidenze di gestione.
No management evidence is available for various pH measurements of the organic oat drink (16%), VERSO NATURE branded.

3.9 Traceability

The management of traceability is reported in the procedure PQ 08.01, dated 03.27.15, which specifies the procedures for each material such as packaging material, raw materials, etc. The traceability system is based on computerized records and allows the identification of the single pallet (SSCC) of finished product. The system was tested on the finished product "Bevanda Avena" brand Conad "Verso Natura" L00'86. Production records showing the arrival of raw materials and sampling controls, batch number of

ingredients, date and time of processing; all packaging and raw materials were traceable by referring to the lot number. Packaging of the finished product: 26.03.20 packaged 2815 boxes of 10 pcs / one equal to 28150 liters of finished product, shelf life of the finished product: 14 months (best before date: 05.26.21), packaging between 11:23 - 17: 07. Identified the batch of semi-finished product: TK 102, and the raw materials used, including: Organic oats: batch L050 / FAZ 4800 kg - Alpha Amylase: HTS batch SNY1291 - sunflower oil: batch L TE00024 successfully during the audit. Packaging material: Tetrapack L221100743380 - cap: Tetrapack lot 3470028575; process records available (CCP recording and sterilization graph, weight control, cleaning performed and CIP cycle). Tracked down all 2815 packs sold to the various Conad plants with 13 bills of landing. Traceability verified on the bill of landing 20/11960 of 04.06.2020. The company conducts traceability tests and product withdrawal from the market annually, assessed on 03.06.2020. Rice cakes Mr. Spike L301021A packaged 448 packages and all shipped. For 2019, the test on the Rapid gran nero Esselunga product dated 06.11.2019 was assessed.

3.10 Complaint-handling

The management is managed by Quality and private labels, Sales Manager for foreign complaints. the management is carried out by Quality which subsequently also carries out a statistical evaluation. Main causes: for rice Foreign bodies and pests (timely reports) treated individually - reports on scotti brand products are managed by customer service with a monthly report of complaints. After evaluating the management of complaints due to product color (too dark), the evaluation identifies in the recirculation of the product during the packaging phase (browning of sugars): introduced a maximum limit of recirculation (1.5 minutes); For the evaluation of complaints for foreign bodies, the foreign bodies that may be found in the product difficult to separate are collected as they have a density similar to rice (glass splinter, hard plastic, soft plastic), these are passed by Sortex to validate the Relative CP. View handling of the complaint of 05.05.20 Rewe complaint on Parboiled product "presence of glassy foreign body" in a 1 kg package, (FB found in rice already cooked with other ingredients), the company replies with an email dated 18.05 stating that given the discovery of the FB on an already complex product it is impossible to trace responsibility for the raw materials rice (the customer accepts). No recall or withdrawal following complaints.

3.11 Management of incidents, product withdrawal and product recall

During the audit, tests were carried out on a lot of Conad "Verso Natura" branded oat drink lot 0086: Traced all 2815 packages sold to the various Conad plants with 13 bills of landing. Traceability verified on the bill of landing 20/11960 of 04.06.2020. The company conducts traceability tests and product withdrawal from the market annually, assessed on 06.03.2020. Rice cakes Mr. Spike L301021A packaged 448 packages and all processed. For 2019 assessed the test on the Rapid gran nero Esselunga product dated 06.11.2019.

4. Site standards

4.1 External standards

Year of construction of the site: 2001, last renovation: the new storage warehouse and the water treatment plant are under construction. The site is spread over a central building with the "rapid" departments, dry risotto, white rice mill, parboiled, rice packaging and vegetable drinks, while facing the street there is a finished product warehouse equipped with seven loading openings, connected to the site there are the gas and biomass plant, the raw material storage silos with a capacity of 7000 meters. The production of rice cakes and snacks is located in another building. The plant is located on the outskirts of Pavia, there are no surrounding activities that could present a potential risk of contamination for the operation. the outdoor uncovered area corresponds to about 60,000 square meters and allows easy disengagement of means of transport, the green areas are well maintained.

4.2 Site security and food defence

A documented assessment of the safety and potential risks for the products is available. A video surveillance system is active. Periodic internal audits are foreseen, subsequently registered in mod. SQ501. Site safety and food defense training was carried out for all employees in January 2019 for the beverage department and December - January 2019 for the other departments. The unloading of bulk beverages, coming from suppliers or shipped to customers, is managed by an internal operator who gives consent to unloading by assigning a destination or identifying the withdrawal tank, however before using them, the entire system is cleaned with CIP, in order to reduce the risks of contamination, foreign bodies and pollution inside the pipes. The food defense manager is identified (Dr Zaninelli) and a team is identified. The site has a fence around the entire perimeter and the entrance is controlled by a reception, which recognizes guests and issues the entrance badge: visitors must wait in specific areas and it is not possible to access the warehouse or department of production if not in the presence of a chaperone. Contractors and visitors are provided with instructions on the behavior to be maintained within the site. There are regular audits by local health authorities, but no safety inspection is required by Italian law. Having verified the assessment of the gap, dated January 2019, external visitors are always accompanied, the cooperative staff is qualified by the supplier, the drivers can enter the warehouse after loading trucks. The internal staff is monitored by responsible and quality personnel.

4.3 Layout, product flow and segregation

Assessed the map with the flows of allergens, personnel, raw materials and packaging, waste dated 06.20.2019: no AHC, HC, HR areas are identified. The main and largest department is dedicated to the processing and packaging of white rice and parboiled rice. Production areas are classified as areas with closed products and low risk areas. A specific hygienic area for beverages is identified, but without identifying an HR or HC area. The workspace is large enough and the storage areas are kept separate from the open product spaces. Processing areas are managed to control any potential risk of product contamination. The internal production staff can move freely within the specific area. Pedestrian crossings are present to show the correct path to follow. Segregation is in place for ingredients that may contain allergens; there is an internal warehouse for finished products and to store the product returned for pest presence.

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

The fabrication of the site and the buildings associated with the processing of the products are quite well organized. There are several production areas, with different levels of security. Most of the manufacturing process is closed and most of the products are microbiologically safe. Generally, the walls are kept in good condition to facilitate cleaning to prevent dirt build-up. The windows are designed not to be opened or otherwise adequately shielded. The windows in the staff structures are adequately shielded. External doors are kept closed or fitted with curtains and are generally suitable for protection against the entry of parasites. There is a progressive replacement of neon lamps with LED lamps and in any case all the lights inside the production and storage areas are protected with plastic covers. Air and ventilation are adequate.

Filtered air is used in the parboiled area to avoid dust in the other departments. In 2019 a new air conditioning system was installed equipped with a cotton air conveyor, managed with four UTA equipment, managed by maintenance, which takes care of the monthly cleaning of the two sets of filters. No HC or HR area.

4.4.2: osservato la pavimentazione del soppalco dry in cattivo stato, inoltre il pavimento zona gallette ha la resina che si scrosta
The flooring of the dry mezzanine was in bad condition, moreover the floor in the cake area has the resin that peels

4.5 Utilities – water, ice, air and other gases

The company uses only mains water for all business processes. It is used as an ingredient in cakes and drinks. The company carries out 4 samples per year made from the 4 sampling points. Assessedtest report 19S21748-it-0 of 12.06.2019 parboiled area sampling, assessed test report 19S21747-it-0 of 12.06.2019 Rapid area sampling, assessed test report 19S21746-it-0 of 12.06.2019 beverage area sampling and assessed test report 19B15134-it-0 of 03.06.2019 collection of rice cakes area.
AIR: the compressors use H1 NSF oil from CPI ENGINEERING SERVICES INC. Assessed the double series of filters installed by QUALITY AIR. The last filter has an SMF code and guarantees 0.01 mg / m3 of residual oil.

4.6 Equipment

The Company carried out a specific risk assessment for all equipment in contact with products and requested the certificate of conformity for construction materials from suppliers.

The food declaration of the plastic tube, used to load and unload liquid products such as soy, milk, in bulk, provided by ISI flex, with food contact declaration has been verified. Checked the technical data sheet of the plastic boxes, by Giganplast, made of PP, dated January, with food declaration by the supplier, simulating alcohol for 30 'at 100 ° C.

4.6.1: osservate coperture in cattivo stato (coperture degli ingredienti reparto dry oppure chiusura in cartone in cattivo stato per la vasca di materia prima linea gallette), inoltre vengono osservati due motoriduttori della linea triangoli insistere sulle tramogge senza carter
Observed roofs in poor condition (roofing of ingredients in the dry department or cardboard closure in bad condition for the raw material tank of the biscuits line), also two gearmotors of the triangles line are observed insisting on the hoppers without casing.

4.7 Maintenance

Procedure PQ09.04, dated 03.18.15, is in place. The conditions of the line following intervention are defined in instruction IO.09.18 "Hygienic recovery after maintenance operations". Assessed the 2020 program maintenance programs for the different departments. Assessed naval battle table with plant list for the RISOTTI DRY department for the first 6 months of 2020. Assessed lubricant spray used (PAKELO no Tox SILICON SPRAY). Seen Bulher's scheduled maintenance intervention report dated 02.26.2020: the company "DA Montaggi" provides maintenance activities on Bulher plants.

4.7.3: Utilizzo di nastro adesivo trasparente per riparazioni temporanee (visto per interruttore posto sull'autoclave) oppure utilizzato per tenere in posizione i tubi
Use of transparent adhesive tape for temporary repairs (seen on switch placed on the autoclave) or used

to hold the pipes in position

4.8 Staff facilities

There are changing rooms for staff distributed throughout the site and dedicated to the different process areas; the changing rooms observed are equipped with double compartment lockers for the storage of civilian and work clothes, the control of the rice production lockers does not reveal any particular critical issues. There are hand washing facilities located in the processing area stocked with soap, disinfectant and disposable towels or hot air blast. External personnel and visitors, entering the food handling areas wearing suitable protective clothing supplied by the company.

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

4.9.1 Chemical control

Chemicals are controlled within the factory and all containers are properly labeled. Chemicals are stored in a separate area from production. Chemicals for CIP systems are stored in a dedicated and closed area. All chemicals are properly stored in an area away from production in a locked environment with limited access. All materials are stored in compliance with their respective technical data sheets. A list of approved chemicals is available. Suppliers handle cleaning chemicals according to specification. The operators carrying out cleaning activities are internally trained in the correct handling of chemicals. Technical specifications and food compliance are evaluated for the lubricants in use.

4.9.2 Metal control

Knives and other similar tools are managed and under control. Staples cannot be used in open product areas. Snap blade knives are not used. The production processes involve the closed product and the blades are used for the opening of bags of raw materials and for the management of plastic packaging materials.

4.9.3 Glass, brittle plastic, ceramics and similar materials

The introduction by the operator of glass or hard plastic material is not allowed; Shatter proof glass is used, the lamps are all tube in tube type. Defined a differentiated risk level: direct risk (potentially in contact with the product) monitoring every day + monthly check list - indirect risk (not in direct contact but possible transport on an open product (quarterly check) - "no risk" if distant from work areas (semi-annual monitoring). A "visual" check list with summary is available (rev May 2020). As seen from monitoring, there are no glass or plexiglass department equipment. Last monthly monitoring: 06.01, previously 05.13 (no recorded breakages or chipping), last breakage recorded: case packer door on 11.22 replaced immediately A breakage management procedure defined (rev 08.01.19) There are no reports attributable to glass or hard plastic breakages.

4.9.4 Products packed into glass or other brittle containers

There are no packaging made of glass or other brittle materials

4.9.5 Wood

Used in warehouse and areas with closed product; foreseen control of the wooden pallets during goods reception.

4.9.6 Other physical contaminants

The raw materials in powder or in pieces are stored in big bags, with the storage in bags of the ready-to-dose mixtures, in this case an opening method is not defined that can prevent any release of packaging material (bag or closing tape); at the departments no plastic pens were observed in correspondence with the exposed product.

4.9.6.1: previsto lo stoccaggio in sacchi delle miscele pronte al dosaggio, in questo caso non viene definita una modalità di apertura in grado di prevenire eventuali rilasci di materiale di confezionamento (sacco o nastro di chiusura)
provided for the storage in bags of the ready-to-dose mixtures, in this case an opening method that can prevent any release of packaging material (bag or closing belt) is not defined

4.10 Foreign-body detection and removal equipment

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

The hazard of physical contamination by metallic foreign bodies is managed through the use of metal detectors, magnets and sieves, depending on the processed products. The packaging lines are equipped with metal detectors. The MD sensitivity is periodically calibrated and described in the HACCP plan. The management of the metal detectors is foreseen according to IO 11.03 in revision 04.13.2015 n ° 9. The control procedures for the MD have proved effective during the evaluation, the detectors are checked at the beginning of the shift, on an hourly basis and at the end of the shift, or in case of product exchange. Operators verify the eject functionality. The functionality test was verified during the audit, both on open products such as rice and packaged products. The positioning and method of ejection of the product involves placing the MD at the end of the line with "buffer" ejection, or if this is not possible, for example dry rice (use of aluminized packaging), the MD is present before filling the package, while a permanent neodymium magnet is positioned at the ingredient loading.

4.10.2 Filters and sieves

The filtration in the beverage department is considered CCP, the filters are placed in sequence, from 0.3 to 3 mm, according to the type of products and the production line.

4.10.3 Metal detectors and X-ray equipment

No X-rays are used, but only metal detectors are placed on all lines. The packaging lines are equipped with metal detectors. The MD sensitivity is periodically calibrated and described in the HACCP plan. The management of the metal detectors is foreseen according to IO 11.03 in revision 04.13.2015 n ° 9. The control procedures for the MD have proved effective during the evaluation, the detectors are checked at the beginning of the shift, on an hourly basis and at the end of the shift, or in case of product exchange. Operators verify the eject functionality. The functionality test was verified during the audit, both on open products such as rice and packaged products. The positioning and method of ejection of the product involves placing the MD at the end of the line with "buffer" ejection, or if this is not possible for example dry rice (use of aluminized packaging), the MD is present before filling the package, while a permanent neodymium magnet is positioned at the ingredient loading.

4.10.4 Magnets

Checked the list of all the magnets of the factory with position, type, strength, defined in 4.10.4 MODSQ90 “List of magnets in the factory”. The magnets are placed on the packaging of the white rice, parboiled rice, "rapid" and extraction of rice juice. The force verification is carried out with a "Gaussmeter Hand-gaussmeter MitPolaritatsanzeige type 181002" and the procedure is detailed in the MOD DSQ90. Checked the calibration, carried out by the maintenance personnel, according to the calibration program.

4.10.5 Optical sorting equipment

Sortex optical sorting equipment is in use in rice processing, maintained and verified annually by the supplier, with self-diagnosis during production and lamp inspection by the supplier. The activity of the new Sortex has been verified, installed on the white rice process, with setting of intensity and% of defective rice, based on the quality of the type of rice and the specific request of customers.

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

No glass containers are used in production

4.11 Housekeeping and hygiene

Defined a cleaning plan whose references are present within the individual departments, developed by internal and external staff (works on the surfaces of the building not on systems), Rev 01 of 01.20.15 developed by area, point of intervention, frequency, type of operation, equipment, products used, contact time, responsibility. Assessed floor for Rapid products. Specifications of products used for cleaning are available. Last training on the cleaning plan: 05 / 02.03 / 19 for the new square line. Cleaning effectiveness check: daily check on the cleaning status carried out by shift supervisor, foreman or quality control. There are no analytical controls (e.g. swabs).

4.11.2: non risultano pianificate le pulizie per le presse delle gallette, i nastri di trasporto del riso ammollato al cuocitore, canaline con cavi elettrici sopra le dosatrici confezionamento.
cleaning for the presses of the biscuits, the conveyor belts of the rice soaked to the cooker, ducts with electric cables above the packaging dosing units are not planned.

4.11.7 Cleaning in place (CIP)

There is a CIP system for washing beverage production plants (acid-base), rinsing, washing with soda, rinsing, acid washing and rinsing is foreseen. A washing program with contact times defined. The washing CIP covers the UHT and Tetrapak systems, in particular: cooker, rice line, soy line, stop 1, stop 2, tank loading, defining times, temperature and acid and basic solution concentration. Cycle monitoring is recorded on the CIP in the ward. analytical checks on the first carton after washing are foreseen: it concerns cross-contamination by allergens (e.g. rice vegetable drink L0021 rep n ° 20A18961-It-0 of 01.30.20 - Soya allergen research), the monitoring also concerns the rinsing water (annual): seen report 19E10796-It-0 dated 05.16.19. - Microbiological control: a stove test is planned on all batches of finished products.

Periodic calibration of the conductivity meter probe is expected (see NC 6.4.2).

4.11.8 Environmental monitoring

Within the hazard analysis, the risk from environmental contaminants (molds and yeasts) on all departments did not show hazards to manage, as control measures such as dehydration, MAP or nitrogen packaging (for dehydrated people), sterilization treatment , the company carries out stress challenge checks to evaluate any organoleptic alterations of the product.

4.12 Waste

Waste is managed in accordance with legal requirements. Having verified the authorization of the ASL of PAVIA prot. 62914 07.30.2008 of the supplier ENAC n ° IT 000235PV and Diusa supplier for the disposal

of the chaff, or husk for burning. Outside there are classified waste collection points. Waste containers are identified and separated for plastic, paper, food waste. Chaff and husks are considered by-products. The accumulation of waste is minimized and the containers are emptied regularly and often. The authorized contractor deals with paper, glass etc. At the date of the audit, the products have not been transferred to third parties. Expired products are destroyed. The waste water is discharged into the public waste water and managed by the municipality. Waste products are sold as feed, registration according to Reg 183/2005 is available, for the disposal of rice.

4.13 Management of surplus food and products for animal feed

The end of production lines will be destined for animal use; for sterilized products and rapid beverages, if the product bears the Scotti brand it is disposed of internally, if it is under the customer's brand, destruction is expected. Pula, granaverde, risina, stored in dedicated silos and follow a dedicated marketing channel.

4.14 Pest management

Site entirely subjected to pest control, an activity entrusted to Chimical Service and in 2018 it passed from the traditional system to a system that involves a person who constantly works at the company that operationally depends on Riso Scotti. Present external belt with rodenticide baits alternating with catching baits - bird control: present catching station for pigeons. Internally: pheromone-based monitoring system (for moth and plodia, anobid and lasioderma), capture lamps (they turn off in the evening when everything is stopped so as not to interfere with the antagonists (which perform an interference action against lepidoptera. Fight through interference with reproduction and for mass traps against lepidoptera. The fight with antagonists is modulated on the basis of the capture of insects. Another measure adopted is the closure of the big bags in a protective ampoule (sack). For crawling insects, the fight with antagonists is also provided. : glue trap Anobides: pheromone traps Fumigation intervention with pyrethrum is foreseen only in emergencies There are no scheduled disinfestation activities on the external area. The use of antagonistic insects does not contaminate the product (the process was validated in collaboration with the University of Milan). Management of silos: treatment by CO2 (for white rice not intended for vacuum packing), in case of vacuum the treatment is not necessary. The plans under revision 19.01 are available divided by areas and type of pests. Last monitoring: fortnightly and monthly for rodents and insects, last performed: 05.25 (use of Refill Xlure for tribolium, xitofilus, Oryzaephilus, lepidoptera, anobids) - 05.21 for rodents (external area - PA Notrac Blox). Presented the trend of catches in the review of 08.05 from which no particular catches emerge, a reduction to 1/5 of the catches of pests is highlighted following the introduction of the fight with antagonistic insects. Periodic reports: 01/16 - 07/16 - 12/01 by the technician Giorgio Polo (Chimical), some structural criticalities emerge subsequently managed with structural interventions.

4.15 Storage facilities

The products are stored in a warehouse located in the basement. Documentation and product labels facilitate correct inventory rotation. All pallets are identified by a barcode label and the batches and types of products being loaded are immediately stored in the database. In the warehouse located in the basement, the storage of pallets of semi-finished and finished products is carried out correctly, well spaced from the wall. The finished products and packaging materials are stored in an external warehouse, owned and managed by the company in via Venerone.

4.16 Dispatch and transport

Raw materials transport outsourced exclusively (they only transport rice) with Italtrasporti, the vehicle being loaded directly prints the stamp of the Ente Risi. Finished product in the tank: transport contracted to

a qualified company, signed documents are available which provide for the prohibition of transport in some cases of transport, while in others certain cleaning actions are envisaged (verified upon receipt of the washing certificate - assessed for road haulage Spalenza snc, plate NO014744 declared washing with water, last transport: rice on 05.25.20 with stamp for acceptance by Riso Scotti.). The document is attached to the contract on 11.28.18. Finished product transport: signed at the time of signing an attachment containing the elements required by the standard, seen for the transporter "The Trasporter srl". Transport in cold conditions is not foreseen.

5. Product control

5.1 Product design/development

A procedure PQ 07.01 rev. 02 dated 06.06.18, the definition of a new product provides for the involvement of various company functions such as Sales Management, QA, production, while for the release of new products the responsibility of MKG manager is identified; new projects mainly involve external suppliers. Consumer needs and expectations are assessed by the marketing department. The product design includes a hazard analysis according to the HACCP plan, to identify and evaluate potential hazards and risks. In the case of development of products with the customer's brand, a direct collaboration is in place with the customer for the development of the formulation, the shelf-life tests are described and documented. At the moment the only reference under development is an existing product for which it will be necessary to change supplier. Spreadable cream shift from supplier NUTKAO to supplier GANDOLA. Assessed the evaluations on the first sample, still considered too sweet, too dark and too dense.

5.2 Product labelling

The label approval involves the specific quality control function of the packaging and is supported by an external expert (CRES, a company of the Group) or by Nerotron or Eutofens in the case of labels destined for a foreign market or are managed directly with the importers , also for legal aspects. The approval of labels for third-party branded products is approved by the customer, having seen the approval for the Conad branded rice and oat drink dated 03.11.19. Nutritional table: by analysis for claim verification, assessed for "Scotti Muuu che bontà", for the claim "Calcium source declared 120 mg / 100 cc - Protein 2.9 gr / 100 cc Rep n ° 20C14625-It-0 of 03.30 .20: Protein 3.1 g / 100 cc and Ca 145 mgr / 100 cc. Labels are checked during production and are removed from the line at the end of production. Labels are stored away from production, waiting to be used for as expected.

5.3 Management of allergens

Procedure IO 06.07 describes in detail the management of allergens. The allergens managed by department are: Rice mills and packaging of rice None - Dry risottos, Crustaceans, Fish, Milk and derivatives, Celery (raw materials cross-contamination), Molluscs, Soy, Sulphites (SO2) - Vegetable drinks: Gluten, Soy, Fruit Nuts - Rapid: Gluten, Milk and derivatives, Soy, Sesame (cross contamination raw materials), Nuts (cross contamination raw materials) - Cakes: Soy, Lupine, Celery (cross contamination raw materials), Sulphites (SO2). All allergens are listed on the product label compliant with European legislation. Dry products: there are special cleaning procedures, however, being unable to be sure of their absence, possible contamination is declared. The absence of lupine is not declared, but the absence of cross-contamination is validated after each production. Assessed test report 20E05622-it-0 of 05.18.2020 by Neotron Accredia n. 026L. In the beverage department, the presence of CIP guarantees the absence of cross contamination, therefore no traces are declared. The gluten-free drinks are certified "Gluten Free" by AIC (Italian association for the celiac disease).

5.4 Product authenticity, claims and chain of custody

A fraud risk assessment has been developed which shows the risk borne by the paddy rice (raw material) for exchange of origin of the product, the mitigation measure is represented by the declaration of the Ente Risi supporting all the receipts of raw material. The organic product is purchased directly from a company of the Group so in this case the risk is managed internally. For the certification of organic products the reference body is Bioagricert, while for the "Gluten Free" requirement the company is periodically audited by AIC, procedures are in place to maintain traceability and traceability tests are performed.

5.5 Product packaging

Detailed specifications and declaration of conformity are available for the materials in use. The materials are assessed as suitable and stored under suitable conditions. The packaging materials are represented by big bags, paper and plastic bags from 5 to 25 kg, plastic bag for vacuum, aluminized plastic bag, plastic Doipack, Tetra Pak and paper and plastic for puffed rice, seen the following technical data sheets and packaging materials
• Assessed Tetrapack TBA200 base technical sheet including relative declaration of conformity dated 01.22.2019.
• Assessed technical data sheet of the basic tetrapack Steampack caps including the relative declaration of conformity dated 01.22.2019.
• Assessed technical data sheet of the cardboard of the blueberry filled bar "Sì con riso, senza lattosio" of the supplier METSA dated 01.31.2019. Blank cardboard.
• Assessed cardboard for 400gr box odeclaration of FUSTELGRAF also containing reference to inks and paints of 05.28.2020.
• Assessed declaration of conformity by Mangiarsano spa relating to the blueberry filled bar “Sì con riso, senza lattosio” dated 07.18.2016.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

The company has an internal laboratory where routine analyzes are performed such as: humidity, quality defects of the incoming rice. The company carries out internal analyzes on pH, brix gradients, proteins, fats, for the monitoring of production parameters. Microbiological tests are also carried out for beverages, with ten days of incubation in an incubator at 32 ° C. Each batch of "Rapid" rice (product subjected to an autoclave cycle) is sampled and sent to "Protezione ambientale" Lab (Accredia no. 0381) to check stability by means of a 2-week incubation test in an incubator for a TB test at 32 ° C. Other microbiological analyzes, pesticide residues, mycotoxins, allergens, filth tests are planned and carried out in external ISO 17025 accredited laboratories. Assessed analysis plan. On raw materials RS PA 2020 rice. 20 GMOs - 9 mycotoxins - Heavy metals 66 - Pesticides 18. Assessed analysis for the research of pesticides test report 03898/20 / R of 03/21/2020, traces of piperonyl butoxide.

Assessed analysis plan of finished products BEVERAGES. Assessed analysis on "MU che bontà" (rice). Test report 03840/20 / R of 03.23.2020. No residue.

Assessed analysis plan of 05.03.2019 provides for periodic shifts analysis on all categories of flavored extruded products, test report AR-19-FJ-011358-01. 120 acrylamide.

5.6.2 Laboratory testing

The company has an internal laboratory where routine analyzes are performed such as: humidity, quality defects of the incoming rice. The company carries out internal analyzes on pH, brix gradients, proteins, fats, for the monitoring of production parameters. Microbiological tests are also carried out for beverages,

with ten days of incubation in an incubator at 32 ° C. Each batch of "Rapid" rice (product subjected to an autoclave cycle) is sampled and sent to "Protezione ambientale" Lab (Accredia no. 0381) to check stability by means of a 2-week incubation test in an incubator for a TB test at 32 ° C. Other microbiological analyzes, pesticide residues, mycotoxins, allergens, filth tests are planned and carried out in external ISO 17025 accredited laboratories.

5.7 Product release

When all the on-line checks, carried out by the on-line personnel, CCP monitoring personnel, give a positive result, the product is released for sale. The quality control manager releases the finished products after verifying the process records, formalized with QC signature on the related forms. UHT drinks (eg soy milk) are placed in quarantine for 14 days, the drinks are subjected to incubation for 7 days with automatic batch blocking and subsequent release by quality in case the analyzes are successful. Until the quality releases the products, the products remain in the company and the shipment of finished products is not possible.

5.8 Pet Food

No pet food is produced.

6. Process control

6.1 Control of operations

Procedures are in place for the control of operations starting from the acceptance of raw materials. The effectiveness of product quality is monitored and all registrations are managed correctly. The CCPs are monitored during the production process and the data is reported on the production sheet with limits and the necessary CAs. The process temperatures during sterilization are subject to routine registration and control. There is a recording equipment of the process parameters in real time, connected to an automatic alarm system and a control of the alarm system is provided, in particular the alarm provided on the sterilizer washing CIP is checked every day in correspondence the closure of the production cycle. On the packaging lines, the package code and lot number are checked and a visual check of the appearance of the package is recorded.
CCP aflatoxins on incoming paddy rice (correlated with the humidity of the raw material), with critical limits of 14.5% humidity on each batch: each truck is sampled in 5 points, with control of defects in the internal laboratory on 3 kg of paddy rice. If the humidity is 15%, the trucks are put on hold and QA makes a decision on the use or rejection of the lot. CCP final drying phase for humidity on parboiled rice: critical limits such as humidity below 15%, monitoring every hour and for each batch of dried parboiled rice, before sending it to the packaging storage silos. CCP for foreign bodies, detection managed by MD during the packaging phase of the entire rice line, critical limits of 3 mm and operating limits of the metal detector relating to the type of finished products, defined for each MD in the HACCP plan for packaging lines according to testers with different dimensions, such as Fe 1.5 mm, 1.8 non Fe and 2.0 mm for stainless steel - for the product intended for microwave cooking the limits are Fe 2.0 mm, 2.5 Stainless steel and non Fe 3.0 mm. On the "Rapid" line there is CCP metal detector before packaging with limits of 7 mm and operating limits with probes of 3 mm for steel and 2.5 mm for Fe and nonFe; other CCP: temperature above 100 ° C for 50 minutes, peak at 124 ° and cooling at 30 ° C, with recording of the sterilization cycle for each batch, the critical limits for the sterilization process are minimum F0 equal to 4, the sterilization process is 50 'at a temperature above 100 ° C, with release of the batch following the verification of stability in the oven - CCP on the dehydrated line: there is CCP on rice (limits: 3 mm for steel and 2.5 mm for Fe and nonFe) and a neodymium magnet for the other ingredients - for the "rapid" and Dry line the monitoring frequency includes monitoring with hourly frequency CCP correlated to the UHT process with sterilization cycle, at 141 , 5 ° C for soy-based drinks and 142.5 ° C for rice-based drinks, in both cases for

15 ". CCP on Puffy Rice (extruded): control of foreign bodies, by means of a metal detector, positioned on "open" product conveyor belt, with limits of 7 mm and with operating limits for Fe, nonFe and Steel of 3 mm. A second metal detector is positioned before filling the packages with extruded products: the position of the CCP is due to the subsequent packaging in aluminized film, with evidence of detection by forming a double package, subsequently inspected by QC. The CPs for beverages are related to filtration for the removal of foreign bodies, the temperature in the storage tank for the product to be shipped in the tank and UHT. Other CPs mainly consist of filters, sieves, magnets, positioned along the production line and the hopper. The plan takes care of the risk assessment for newly formed products such as acrylamide, MCPD and furans.

6.2 Labelling and pack control

The startup check is done by the online manager and the records are kept; foreseen control of the lot, the packaging and the labels carried out by the production staff. The coding and printing of the labels (batch and expiry date) are managed by authorized production personnel on an hourly basis, in particular by the line manager with registration on the production module.
Expected: line emptying and subsequent removal of residues, removal of the old pack and replacement with new packaging materials, lot setting and expiry of the new product. During the verified audit, I change from Production of 150 g tube of biscuits under the Scotti brand RISO E CORN L 12/05/20 "to production of 120 g tube of cakes under the AMO ESSERE BIO brand of the customer" EUROSPIN AI 5 CEREALI " L 12/05 / 20A

6.3 Quantity, weight, volume and number control

Checked weight control performed on the product batches during the traceability test phase, in particular: Avena drink batch L0086: nominal: 1000 ml, minimum tolerated quantity: 999.6 ml average of the weighings (density considered: 1.048 g / ml): 1000 , 15 ml, batch accepted, check carried out on a sample of 80 pcs. Metric office control: deadline 05/20, scheduled intervention requested by email for the next 06.17 (delay due to Coronavirus block). Assessed the metrological booklets of the weight control scales of the SARTORIUS cake and extruded line n. 24307288 and n. 36136530 metric stamp made on 05.27.2019 with deadline 05.27.2022.

6.4 Calibration and control of measuring and monitoring devices

Assessed annual calibration on metal detectors. Report dated 11/04/2019 n. BO-61540060012 by Minebea intec Cake line. Assessed calibration with primary company thermometer TERSID LAT169 / 0207/20 dated 02.04.2020 of PT10 of the UHT beverage sterilization line, Tank 102 probe, parboiled area dryer probe and PT100 of the RAPID line autoclave at 0 ° C, 50 ° C and 150 ° C.

6.4.2: I conducimetri del CIP non sono tra gli strumenti sottoposti a taratura.
CIP conductivity meters are not among the instruments subjected to calibration.

7. Personnel

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

Assessed the RS 2020 personnel training program. It includes interventions divided by:
Scope, Department, Level, Event Type, Frequency and Event Duration. No one has yet been completed due to the covid-19 emergency. As for the 2019 training, internal training on HACCP, food defense and allergens was verified, for the production management staff, from 13th to 15th March, duration: 6 hours, 8 participants, carried out by the quality manager, with final verification of the effectiveness by QC on the

participation of the group. Checked the training on the operators of the beverage department of the production carried out by the manager in the period 01.11 - 15.19,
with regard to hygiene standards, closed by quality manager with verification of the effectiveness of training by on-site inspection; the same quality manager checked the training on BRC v8 and IFS 6.1, carried out by an external consultant, for quality and production manager, April 2019, from 29th to 30th, with final discussion.

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

The company has documented the personal hygiene standards in the document "Hygiene rules for external operators" updated on 02.04.2016, adopted by all staff and visitors. The effectiveness of the personal hygiene procedure applied is checked during the weekly inspection. Expected use of suitable clothing provided by the company for both staff and visitors, which are regularly washed by a qualified external company (ELIS), which replaces work clothes twice a week. All staff can eat and drink only in designated areas. Use of colored plasters (contrasting color) to protect uncovered wounds. The patches are equipped with a detectable strip to avoid contamination of the product subject to periodic control with metal detectors. Personal medicines are not taken into production or storage area unless authorized.

7.3 Medical screening

There are hygiene rules for employees. The Company organizes a medical examination at the headquarters on an annual basis for a general health check. The visitor hygiene rules are delivered before entering the establishment which is signed for inspection. Visitors are required to inform in case they are subject to pathology and contagious. The internal staff must inform the management in the event of a contagious disease.

7.4 Protective clothing: employees or visitors to production areas

Each operator has 11 shirts - 3 sweatshirts - 7 pants at his disposal. The Elis company passes by every Monday and Thursday to collect dirty clothes and leave the clean ones in their lockers. Assessed the analysis with swabs with research of TBC, coliforms, molds and yeasts, spore-forming bacteria. By Elis (UNI14065 certified), test report 59129/2019 of 12.20.2019, Accredia No. 0569. Clean and dirty clothes are separated inside the locker. Men with beards must wear a disposable beard cover. During the audit, it was observed that operators wore appropriate footwear; gloves used with food products are kept in good condition and used especially in packaging lines. The gloves are visually distinct from the product.

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones

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

There are no high risk, high control and high control at room temperature areas

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

There are no high-risk, high-control areas

8.3 Maintenance in high-risk and high-care zones

There are no high-risk, high-control areas

8.4 Staff facilities for high-risk and high-care zones
There are no high-risk, high-control areas
8.5 Housekeeping and hygiene in the high-risk high-care zones
There are no high-risk, high-control areas
8.6 Waste/Waste disposal in high risk, high care zones
There are no high-risk, high-control areas
8.7 Protective clothing in the high-risk high-care zones
There are no high-risk, high-control areas

Details of non-applicable clauses with justification	
Clause/section reference	**Justification**
3.5.2.3	the management of live animals is not foreseen
3.9.4	no rework is foreseen
4.2.4	there is no verification by the authorities on the food defense rules implemented.
4.4.5	there are no false ceilings
4.9.4.1	there are no packages made of glass or other brittle masterials
4.9.4.2	there are no packages made of glass or other brittle masterials
4.9.4.3	there are no packages made of glass or other brittle masterials

4.10.6.1	No glass containers are used in production
4.10.6.2	No glass containers are used in production
4.11.8.1	within the hazard analysis, the risk from environmental contaminants (molds and yeasts) on all departments did not show hazards to manage, as control measures such as dehydration, MAP or nitrogen packaging (for dehydrated people), sterilization treatment , the company carries out stress challenge checks to evaluate any organoleptic alterations of the product.
4.11.8.2	within the hazard analysis, the risk from environmental contaminants (molds and yeasts) on all departments did not show hazards to manage, as control measures such as dehydration, MAP or nitrogen packaging (for dehydrated people), sterilization treatment , the company carries out stress challenge checks to evaluate any organoleptic alterations of the product.
4.11.8.3	within the hazard analysis, the risk from environmental contaminants (molds and yeasts) on all departments did not show hazards to manage, as control measures such as dehydration, MAP or nitrogen packaging (for dehydrated people), sterilization treatment , the company carries out stress challenge checks to evaluate any organoleptic alterations of the product.
4.13.2	the customer's branded product is destroyed
4.15.4	storage in MAP is not foreseen
4.15.5	there is no external storage
4.16.3	Cold transport is not foreseen
5.8	no pet food is produced
5.8.1	no pet food is produced
5.8.2	no pet food is produced
5.8.3	no pet food is produced
6.2.4	there are no inline label control systems

7.4.6	protective clothing unsuitable for washing or metal protections are not used
8.1	There are no high risk, high control and high control at room temperature areas
8.1.1	There are no high risk, high control and high control at room temperature areas
8.1.2	There are no high-risk areas
8.1.3	There are no high-risk, high-control areas
8.1.4	There are no control areas at room temperature
8.2.1	There are no high-risk, high-control areas
8.2.2	There are no high-risk, high-control areas
8.3.1	There are no high-risk, high-control areas
8.3.2	There are no high-risk, high-control areas
8.3.3	There are no high-risk, high-control areas
8.4.1	There are no high-risk, high-control areas
8.5.1	There are no high-risk, high-control areas
8.5.2	There are no high-risk, high-control areas
8.5.3	There are no high-risk, high-control areas
8.6.1	There are no high-risk, high-control areas
8.7.1	There are no high-risk, high-control areas

8.7.2	There are no high-risk, high-control areas
8.7.3	There are no high-risk, high-control areas

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

Traded products are not included in the scope.

9.2 Specifications

Traded products are not included in the scope.

9.3 Product inspection and laboratory testing

Traded products are not included in the scope.

9.4 Product legality

Traded products are not included in the scope.

9.5 Traceability

Traded products are not included in the scope.

The Company

We are a team of people, engaged in developing new projects and products in order to spread our passion for rice and satisfaction to our partners.

Founded in 1860 in Pavia (Italy) by Ercole Scotti, today Riso Scotti is a 220€ million revenue company which is still family-owned and operated. The chief executive comes from the fifth generation of the Riso Scotti family running the company. Today it is considered the Italian leading player in rice and rice-based products.

QUALITY

TOP QUALITY RICE CERTIFIER

Riso Scotti Certifications:

ISO 14000, ISO 9001; BRC, IFS,
AIC Gluten free; NOP; BIO;
KOSHER; VEGAN OK; FAIRTRADE

TRADITION

160 YEARS OF PASSION FOR RICE

Family-run business
6 generations
160 years

INNOVATION

BREAKTHROUGH CHANGE

The pioneer of vacuum-packed rice.

Technological expertise offers consumers a new experience of rice consumption thanks to product diversification.

The first in Italy to launch rice diversification.

SUSTAINABILITY

GREAT ENVIRONMENTAL ATTENTION

0% production waste.

Energy recovery in production.

365 day, non-stop production.

Reduction of packaging material.

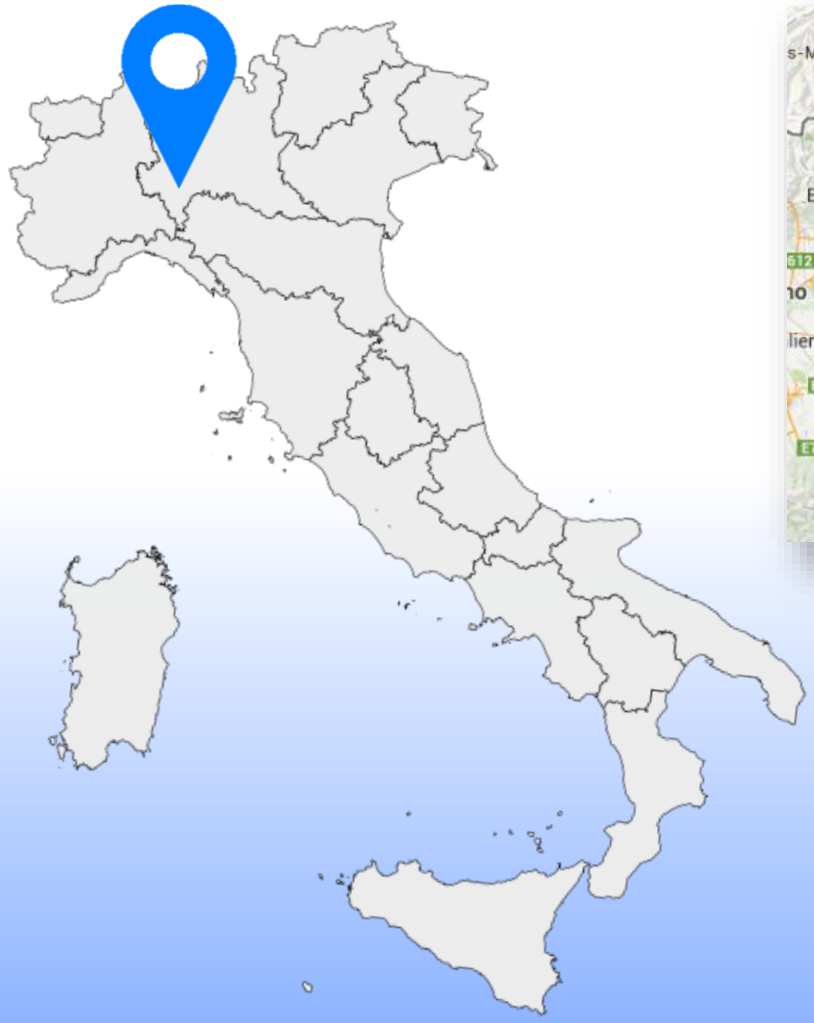
Open project for a full supply chain control.

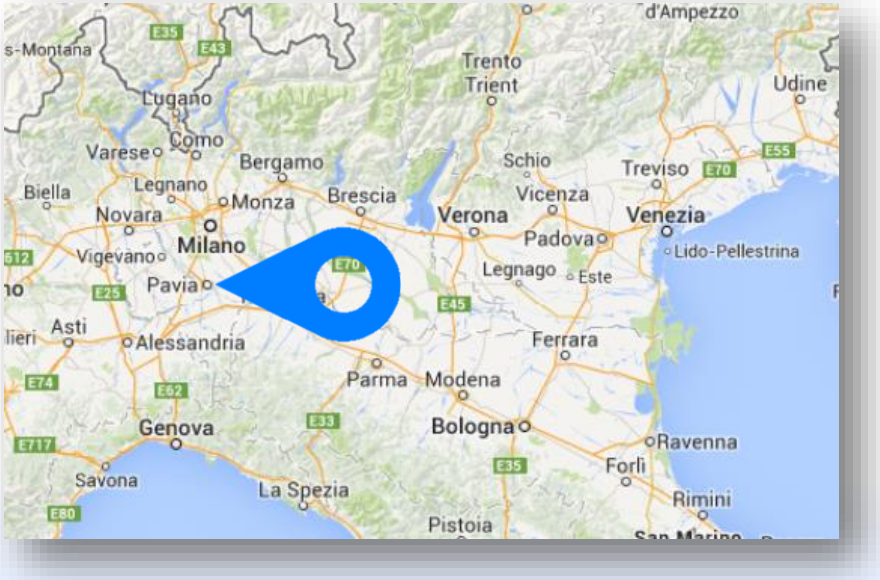
A cogeneration plant that rationalizes the use of fossil energy.

+13% energy consumption BUT -39% gas emission in 2019

Riso Scotti

Where we are located





Riso Scotti is located in Northwest Italy, in the Lombardy region, on the outskirts of Pavia and about 40 kilometres away from Milan.
The area between Milan and Pavia is an important rice cultivation area in Italy, together with the Piedmontese cities of Vercelli and Novara.

Riso Scotti

How consumers see us

A family-owned brand with a 160-year experience

A modern food industry that cares about the environment

The top-of-mind premium rice brand

An innovative brand that cares about market demands

A passionate brand that guarantees excellence

Riso Scotti

100% Italian Supply Chain

PADDY FIELD

Italy is the #1
rice-producing country in
Europe (1.650.000 MT)

PRODUCTION

Leading company for rice production and rice-based products: BIVIO VELA production hub

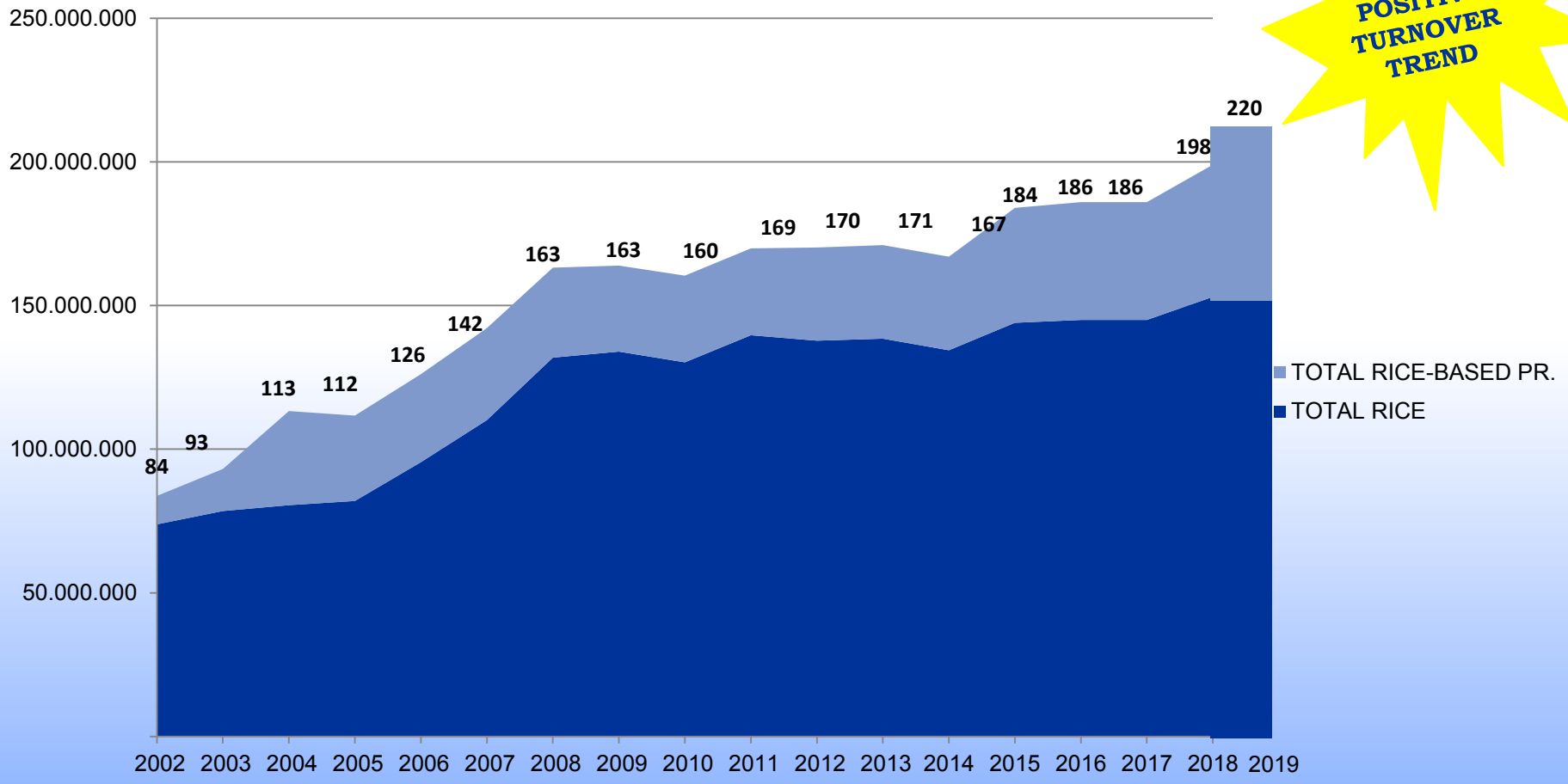
CULTIVATION

Riso Scotti works in close cooperation with its suppliers and farmers to make sure to be using the most innovative cultivation techniques and to obtain the best raw material

Riso Scotti

Turnover trend (€) 2002-2019

A fast-growing Italian firm



Riso Scotti

Our Leadership in Italy

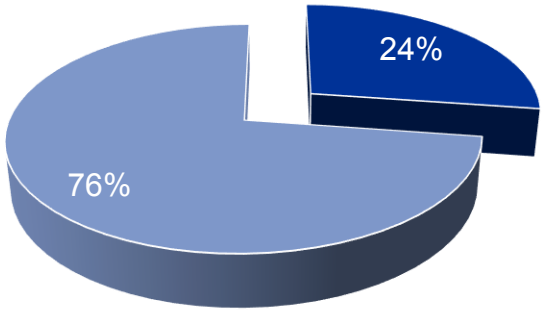
MARKET SHARE (RETAIL) – Leadership	
Arborio	27,4%
Carnaroli	27,6%
Wholegrain	30,9%
Basmati	45,1%
Vegetal Drinks	12,7%
Rice Cakes	24%

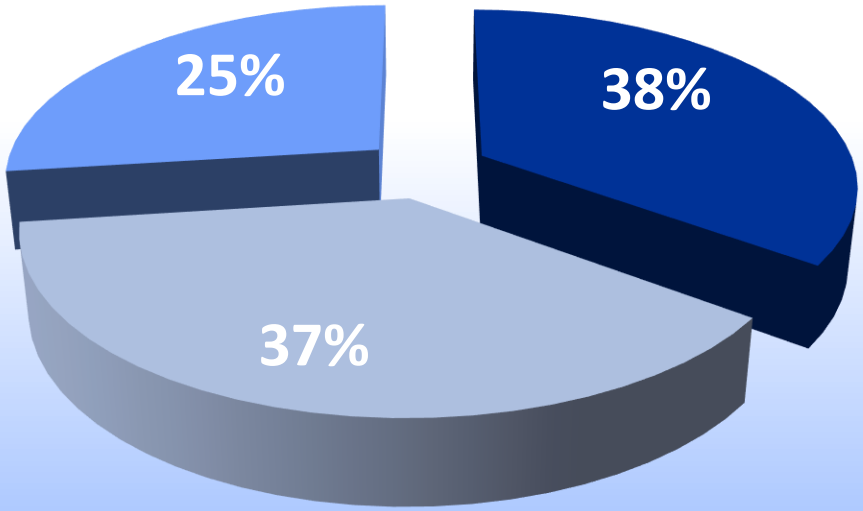
MARKET SHARE (FOODSERVICE) – Leadership	
Foodservice	72%

Source: IRI 2019 Market Share in Value (NO PL)

Riso Scotti

Export Turnover 2019





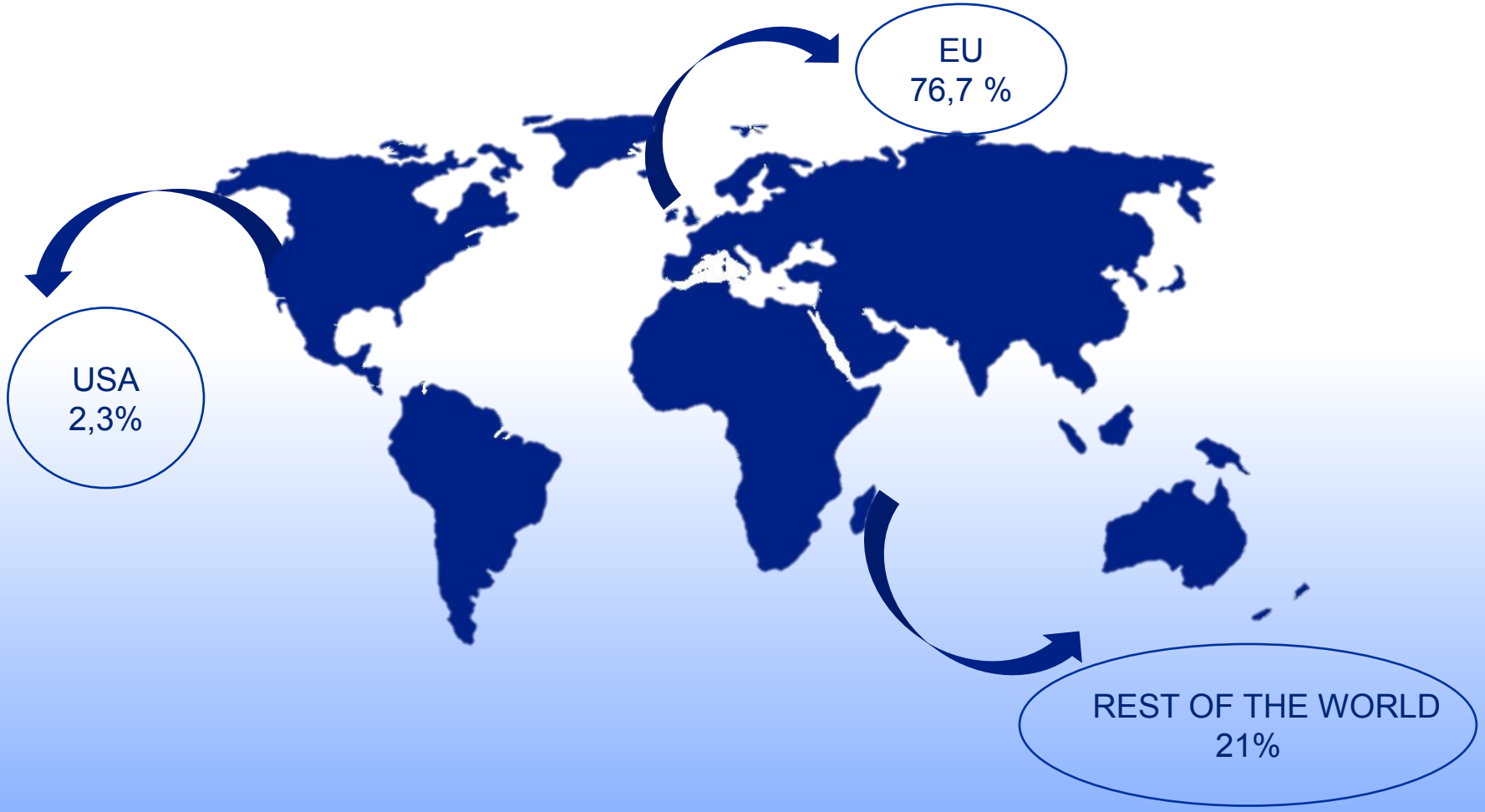
- Consumers identify the Riso Scotti brand as a high quality brand.
- We are supplying the most important retailers in EU with PLs.
- In B2B we are supplying the most important food manufacturers.

Fonte: Dati interni

Riso Scotti

Riso Scotti Abroad

Riso Scotti represents Italian food tradition all over the world.
We are present in 85 countries.



Source: Internal Data - Turnover

Riso Scotti

The production site

GENERAL INFORMATION

YEAR OF CONSTRUCTION: 2001

TOTAL AREA: 135.000 sqms

SILOS CAPACITY, PADDY: 5.600 tons

SILOS CAPACITY RICE: 3.000 tons

WORKING DAYS: 365 days

SHIFTS: 3 FOR RICE PROCESSING and VEGETAL DRINKS - 2 FOR OTHER LINES

WORK FORCE: 200 PEOPLE

PRODUCTION CAPACITIES

RICE

WHITE RICE: 300 tons / day

PARBOILED RICE: 260 tons / day

RICE-BASED PRODUCTS

EXPRESS RICE: 9.000 units / day

VEGETAL DRINKS: 90.000 lts / day

DRY RISOTTO: 30.000 units / day

RICE CAKES: 68.000 units / day

Rice Production at Riso Scotti

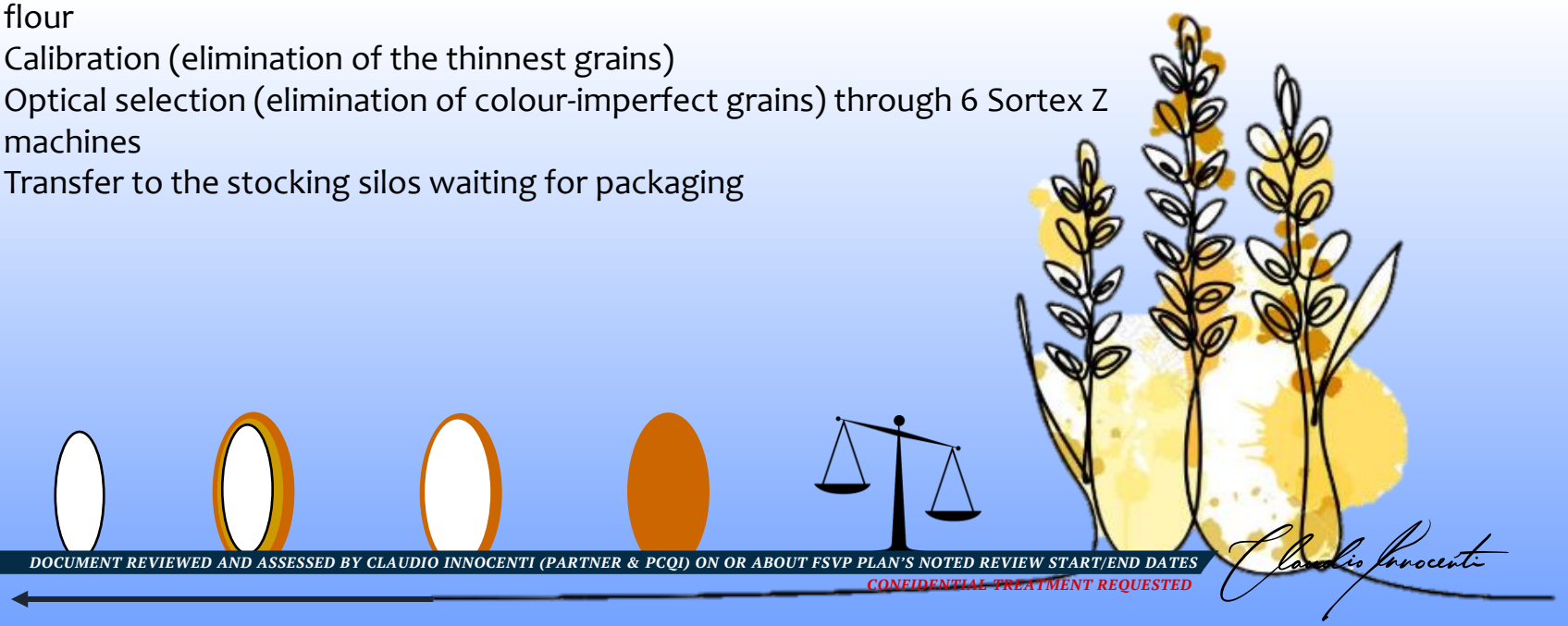
An ancient «mola»

Riso Scotti wants to maintain the **traditional processing of rice**:
In order to de-husk the rice, around 1850 the "*mola*" was invented in Nothern Italy. The mechanism was very easy: **two rounded and scraping stones**, one above the other, rotating together and delicately removing the rice husk.
It was a **great innovation**, since the process was faster and just one person was needed to move the "*mola*". Today Riso Scotti still works rice with the traditional "*mola*".

Our machineries today have of course been modernized: those that process white rice are named "Amburgo" and, inside, the "*mola*" is still the best performing element. In fact, thanks to its conic shape, the "*mola*" de-husks the rice delicately, giving back **lustrous** and **bright** grains **without damaging** the grain and maintaining all its nutritional properties. **The process is natural, just as it was 160 years ago** and Riso Scotti is proud to maintain the tradition of its ancient mill.

Standard Production Process

1. Paddy rice receipt
2. Sampling, yield measurement and verification of the T&Cs of the purchase contract supply
3. Truck unloading and transfer of the paddy rice to the stocking area
4. Cleaning (elimination of straw, earth, pebbles)
5. Husking (dehulling, detachment and separation from the rice grain of the husk, that is the light layer which envelops each grain) rice →brown rice
6. Whitening (bran elimination) rice→ white rice
7. Sieving (elimination of the broken/incomplete grains) discarded grains → rice flour
8. Calibration (elimination of the thinnest grains)
9. Optical selection (elimination of colour-imperfect grains) through 6 Sortex Z machines
10. Transfer to the stocking silos waiting for packaging



Riso Scotti's Parameters

In order to offer superior quality rice, Riso Scotti has identified some qualitive parameters which have a stricter range compared to international laws' criteria:

OUR PARAMETERS		
Parameters	Scotti criteria	International Law criteria
Broken kernels	1,75	5
Damaged kernels	1	2,5
Red-striped kernels	1	3
Chalky kernels	1,5	4,5

Riso Scotti

Italian Risotto

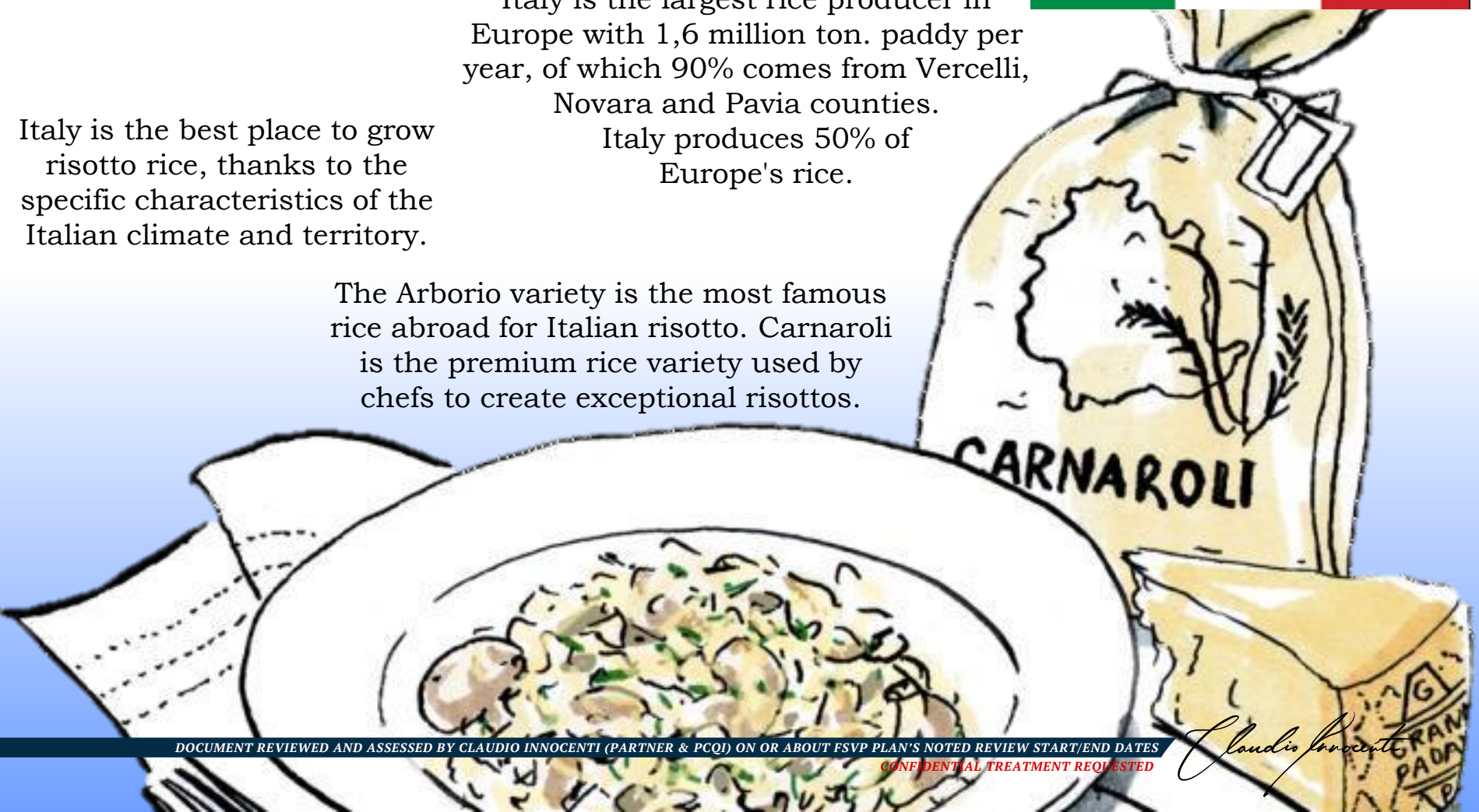
Italy is famous for its risotto and a number of rice varieties have been developed for this purpose, especially Arborio and Carnaroli.

Today, Italian risotto is present on many restaurant menus around the world.

Italy is the largest rice producer in Europe with 1,6 million ton. paddy per year, of which 90% comes from Vercelli, Novara and Pavia counties. Italy produces 50% of Europe's rice.

Italy is the best place to grow risotto rice, thanks to the specific characteristics of the Italian climate and territory.

The Arborio variety is the most famous rice abroad for Italian risotto. Carnaroli is the premium rice variety used by chefs to create exceptional risottos.



Riso Scotti

Our Rice Varieties

	Italian Rice for RISOTTO	Other Varieties
Grain Form	▪ Long grain A	▪ Long Grain B
Cooking	▪ Ideal for Risotto ▪ Develops a creamy texture ▪ Exceptional ability to absorb flavors ▪ Strong Consistency	▪ Ideal as a Side Dish ▪ Soft Consistency

Riso Scotti

Our Rice Varieties

ARBORIO

Description	It's a rice ideal for risotto. It has a large grain and pearl that increases in volume during cooking , giving as much starch that can stir the risotto
Category	Superfino
Ratio (L-L)	2,04
Arborio main characteristic	Grain Creaminess Big Grains with a central part rich of amylose/rice starch
Scotti guarantee	Broken grains < 1, 75% (Italian law maximum 5%) Damaged grains < 1,00% (Italian law maximum 2,5%)
Time of cooking	14 - 16 min

CARNAROLI

Descritpion	The starch of its grains is particularly rich in amylose , which makes them consisting, of great seal to cooking and with excellent fail to see absorption
Category	Superfino
Ratio (L-L)	2,15
Carnaroli main characteristic	Grain Texture /consistency 24% of amylose
Scotti guarantee	Broken grains < 1, 75% (Italian law maximum 5%) Damaged grains < 1,00% (Italian law maximum 2,5%)
Time of cooking	16 – 18 min

VIALONE NANO

Description	It has large, short and rounded grains, but very rich in amylose , remaining very compact during cooking.
Category	Semifino
Ratio (L-L)	1,66
Vialone Nano Main characteristic	Cultivated in Veneto Region (Nord East) Good results in cooking
Scotti guarantee	Broken grains < 1, 75% (Italian law maximum 5%) Damaged grains < 1,00% (Italian law maximum 2,5%)
Time of cooking	13-15 min

Riso Scotti

Our Retail Clients

Riso Scotti

Our Food Service Customers

Search Results

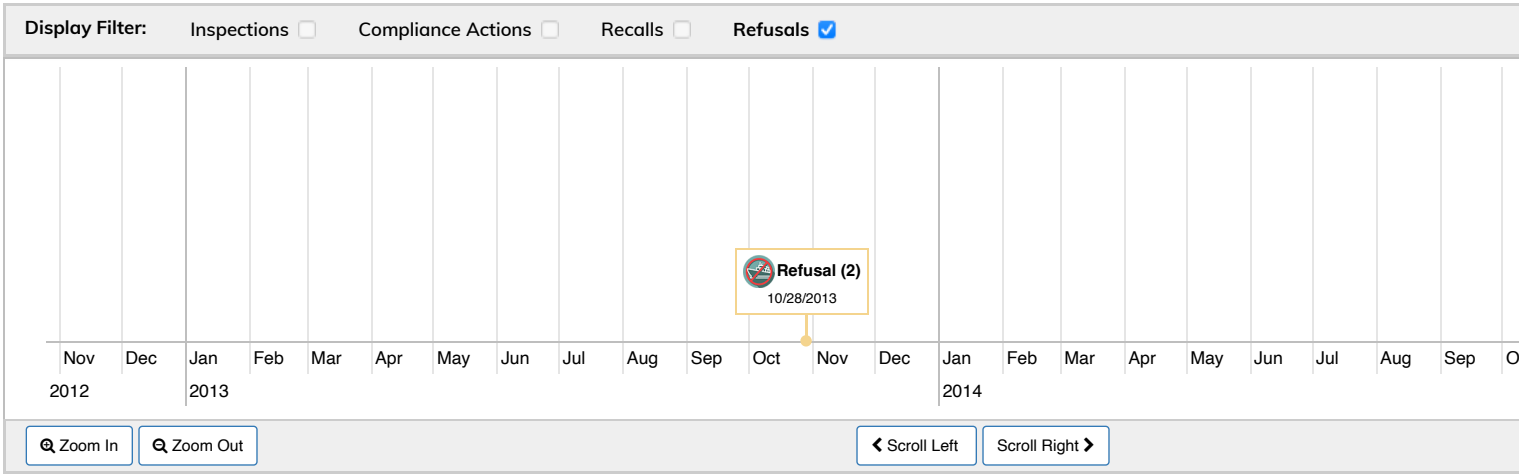
FEI Number	Firm Name	Physical Address	Mailing Address
3013037778	RISO SCOTTI SPA	Scotti, Via Angelo Amati 2, Pavia, Pavia, 27100, IT	Scotti, Via Angelo Amati 2, Pavia, Pavia, 27100, IT

FEI Number
3013037778

Firm Name
RISO SCOTTI SPA

Firm Address
Scotti, Via Angelo Amati
Pavia, Pavia 27100
Italy

FDA Actions Timeline



3013037778 – RISO SCOTTI SPA

Inspections

Inspections	Classifications
0	0

Inspection Classifications by Fiscal Year

No data found for the selected firm

Inspection Classifications by

No data found for the selected firm

Inspections Details Help

No data found for the selected firm

Inspections Citations Details

No data found for the selected firm

*Citations data include Form FDA 483 citations and may not necessarily represent citations on final classification letters.

3013037778 – RISO SCOTTI SPA

Compliance Actions

Warning Letters	Injunctions	Seizures
0	0	0

Actions by Percentage

No data found for the selected firm

Compliance Actions Detai

No data found for the selected f

3013037778 – RISO SCOTTI SPA

Recalls

Recalled Products by Classification

No data found for the selected firm

Recalls Details

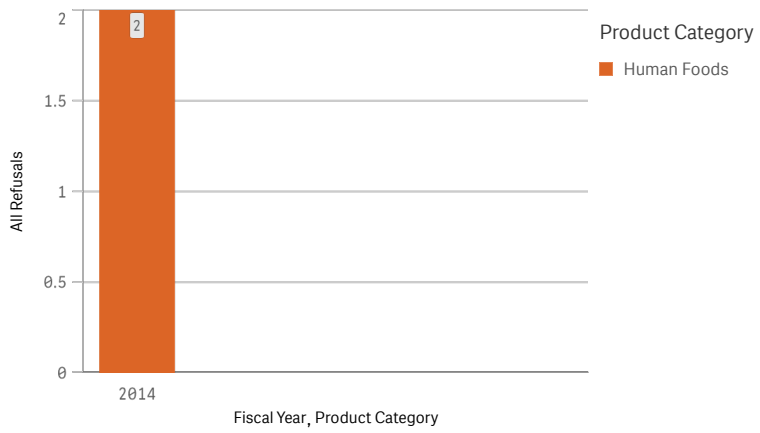
No data found for the selected firm

3013037778 – RISO SCOTTI SPA

Import Refusals

Refusals by Product Category

Fiscal Years: 2014 - 2014



Product Code and Description	Refused Date	Refusal Charges
02AVT05 \ RICE, CULTIVATED, WHOLE GRAIN	10/28/2013	3721
02AVT05 \ RICE, CULTIVATED, WHOLE GRAIN	10/28/2013	3721

3013037778 – RISO SCOTTI SPA

Import Alerts

- Search results are not returned based on an exact match of the firm name. Users should review the search results to determine whether the firm appears in the Imp allowed into the country.
- Only current/active Import Alerts are displayed. For more information see Import Alerts.

No Import Alerts data found for the selected firm.

3013037778 – RISO SCOTTI SPA

Warning Letters

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

No Warning Letters data found for the selected firm.

Caveats:

- Certain information in these datasets may not be presented or may have changed since the posting. The datasets are updated weekly and only include final actions. If you need to official purposes or have questions about obtaining other data, please contact the Division of Freedom of Information about what materials may be available in electronic reading r satisfy your needs.
- Compliance data provide information on a subset of the actions used by the FDA to bring firms into compliance, specifically data pertaining to Warning Letters, Seizures, and Injun only finalized and completed actions and are primarily used in the domestic arena.
- More than one establishment may be associated with one compliance action. The counts provided in this section reflect the number of establishments linked to the compliance acti
- For more information regarding the Center for Tobacco Products (CTP) issued warning letters click here.
- FDA has removed Medical Device Single Audit Program (MDSAP) audit reports, which are conducted by certified third-party auditors and may be considered in lieu of an FDA surv FDA has determined that MDSAP audits do not meet the criteria for posting on the FDA Data Dashboard.