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Nicho Produce Co., Inc. Food Safety Manual

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I. Food Safety Policy

Nicho Produce Co., Inc. (NPC) is committed to providing product which is safe for human consumption. The Food Safety Policy (NPC-FS-001) states the objectives of the Food Safety Program at NPC.

The program is built on HACCP-based food safety principles using risk-based analysis. The entire operation is analyzed by activity and risks associated with the activity. Policies and procedures have been developed for each step to ensure specifications are met. Results are documented and kept on file. Responsible primary and secondary personnel have been identified for each part of the Food Safety Program including Pre-requisite programs (NPC-FS-007).

A well trained workforce is the key to successful implementation and maintenance of the Food Safety Program. All associates are trained in Good Hygiene Practices, general workplace requirements and in the specific tasks for each job classification. All materials are provided in the language most easily understood by the associate. Training records are maintained.

II. Hazard Analysis and Critical Control Point (HACCP)

The Food Safety Program at NPC is aimed at prevention of contamination by control of associated health hazards. The five steps and seven principles of HACCP are incorporated into the program.

- 1.) Assemble a team.
- 2.) Describe the product.
- 3.) Identify the intended use.
- 4.) Construct flow diagram.
- 5.) On-site confirmation of flow diagram.
- 6.) Identify the potential consumer health hazards.
- 7.) Identify the control points where the identified hazards may occur.
- 8.) Establish critical limits for the potential hazards and safety measures.
- 9.) Establish monitoring routines to ensure safety measures are working.
- 10.) Establish appropriate responses if monitoring indicates a problem.
- 11.) Establish an accurate and detailed record keeping system that documents problems and the remedial steps to be taken.
- 12.) Establish a verification system that ensures the above steps are being followed.

The HACCP program is comprised of several elements. The HACCP Policy (NPC-RA-001) describes the methods in use to meet the requirements. A HACCP Team has been formed to conduct the hazard analysis. The HACCP Team is led by individuals who have successfully completed an accredited HACCP course. All team members have received HACCP training. All employees have been trained in basic HACCP principles. Product Specification Sheets have been developed for each product to be used in the hazard analysis. The HACCP Flow Diagram (NPC-RA-004) depicts the process in use at NPC. A decision tree is used to determine if a

Critical Control Point is present. The hazard analysis has determined that no Critical Control Points exist in the operations of NPC.

The HACCP program is reviewed annually by the CEO of NPC and the company's QA QC Manager. The HACCP Change Log (NPC-RA-003) is maintained to document program reviews and changes.

III. Training

NPC Training Policy (NPC-TR-001) states that NPC is committed to providing the appropriate level of training to all associates employed in its operations. This includes employees of NPC as well as contract labor engaged in operations at NPC. It is the policy of NPC to have successfully trained and skilled individuals in every position. This policy includes the ability to ascend skill levels in a measured manner.

Training includes workplace safety, good hygiene practices, food safety, HACCP, total quality management, production-related task training, and career development. Training is regularly conducted and documented. Training is conducted in the language most easily understood.

The Training Procedure (NPC-TR-002) describes the methods in use for training. Use of Job Descriptions, job-specific training materials, and Formal Training Records (NPC-TR-003) ensure that expectations are met at each skill level. Records of training sessions are kept and a Training Register (NPC-TR-005) is maintained.

IV. Good Hygiene Practices (GHP)

NPC has developed Good Hygiene Practices (GHP) for use in its operations. A written program sets forth the Procedures (NPC-GH-002) and requirements (NPC-GH-003).

All associates are provided GHP training at the time of hire and as refresher training quarterly. The training is documented.

To ensure that the practices are being followed, employees are observed for compliance to the GHP's as part of the Pre-Operational Inspection (NPC-PO-002).

V. Approved Suppliers

To control the quality and safety of the products it purchases, NPC has established an Approved Supplier Policy (NPC-AS-001). The Approved Supplier Procedure (NPC-AS-002) defines the process for approval of vendors of contract services, support suppliers, suppliers product and primary packaging for NPC. The Approved Suppliers Specification (NPC-AS-007) outlines the requirements all suppliers must meet prior to providing goods and services to NPC.

NPC maintains an approved supplier list for all vendors of contract services (NPC-AS-005), support suppliers (NPC-AS-006), growers of product suppliers (NPC-AS-003) and primary packaging vendors (NPC-AS-004). Current copies of supplier guarantee letters, certifications, 3rd party audit and other documents are kept on file. In the case of a change in suppliers a copy of their requirements must be sent to NPC prior to approval of said supplier. Administration will store licenses, permits and other legal documents as provided in the procedure documentation.

VI. Sanitation

Thorough and proper sanitation is essential to the Food Safety Program at NPC. The Master Sanitizing Procedure (NPC-SA-002) outlines the methods for ensuring that the facility and all of its equipment is properly sanitized. The verification procedure is also defined.

Sanitation Standard Operating Procedures (SSOP's) are used to provide instructions to the Sanitation Staff regarding detailed procedures for sanitizing the facility and equipment. Chemical mixing and handling instructions are found in the SSOP's. The SSOP's are machine or location specific.

The Master Sanitation Schedule (NPC-SA-003) provides written documentation that all tasks have been performed and verified. Locations are provided for each task to initial that tasks have been completed and that the work has been verified.

An inventory of all chemicals in use at NPC is maintained per the Chemical Inventory Procedure (NPC-SA-005). The Monthly Chemical Inventory Report (NPC-SA-006) is maintained by the QA QC Manager and is reviewed monthly by the CEO for any irregularities in usage.

The Microbiological Testing Policy (NPC-MT-001) provides a commitment to a continuously improved program of risk based analysis and testing to ensure the highest level of food safety. The Microbiological Testing Specifications (NPC-MT-005) define the standards for the tests to be conducted. The Microbiological Testing Scheduling Procedure (NPC-MT-002) defines the methods and responsibilities for setting the schedule of environmental testing. The various schedules define the tests to be conducted and the frequency at which the tests are conducted. The test results are used to adjust the Microbiological Testing Schedule (NPC-MT-004) using a risk based approach.

VII. Pre-Operational Practices

Before the initiation of daily activities, extensive checks are made of the NPC facility and equipment as set forth in the Pre-Operation Policy (NPC-PO-001). The Pre-Operation Procedure (NPC-PO-002) provides the details for completing the inspections, documenting results, and performing corrective actions.

The Pre-Operation Inspection Report (NPC-PO-003) is used to ensure that the facility is ready for operation. It lists the items to be inspected, the standard to which each is measured and provides a space for grading (pass/fail). In the event of a failure, instruction is provided regarding mandatory hold actions. A place is provided for corrective actions. Each daily inspection serves as confirmation that corrective actions required from the prior day were taken.

VIII. Incoming Inspection

All incoming items will be received in accordance with the Receiving Policy (NPC-RC-001). The Receiving Procedure (NPC-RC-002) defines the methods and responsibilities for receiving material for NPC. The document applies to all packaging supplies and produce received by NPC.

IX. Temperature Control

All product handled by NPC will be maintained at the optimum temperature to ensure superior quality and food safety. Inbound vehicles are checked for proper temperature upon receipt in accordance with the Receiving Procedure (NPC-RC-002). Product is stored in temperature controlled rooms which are monitored in accordance with the Temperature Measurement Procedure (NPC-TC-002). The Shipping Procedures specifies that each shipping vehicle is pre-cooled prior to loading to ensure safe transport of products to customers.

X. Water Testing

The Microbiological Testing Procedure (NPC-MT-004) outlines the steps taken to ensure potable water is provided to the facility. Potable water supplied to the plant is tested annually for municipal-sourced water.

XI. Foreign Object Prevention

All produce handled at NPC is visually inspected for the presence of foreign objects. The Foreign Object Control Policy (NPC-FO-001) outlines the steps for the safeguarding of food from adulteration and contamination by broken glass or ceramic, or brittle (broken) plastic (GCBP). The presence of any other type of foreign object is recorded on the NUOCA Log (NPC-PA-004). A Glass, Ceramic, and Brittle Plastic Procedure (NPC-FO-002) defines the methods and responsibilities for handling any GCPB breakage at NPC. A Glass, Ceramic, and Brittle Plastic Register (NPC-FO-003) is maintained on a monthly basis.

XII. Product Tracking

The Product Tracking Specification (NPC-PR-007) illustrates the methods of identifying product through all stages of production and storage at NPC.

XIII. Product Release

The Product Release Procedure (NPC-QA-006) defines the program of transitioning product through the process and the manner in which it is to be correctly handled at various steps in the process. Product is inspected, as per the procedures outlined in the Inspection and Packaging Procedures (NPC-QA-022). Various reports are used to record the results of the evaluations. Product is not released from one production step to another until the product has met specifications

The Non-conforming Material Procedure (NPC-QA-002) defines the methods and responsibilities for handling items which do not meet the specification. Product placed on hold will be identified with a Hold Tag (NPC-QA-003) and will be moved to a designated area. Only the QA QC Manager or the CEO is authorized to release product from hold.

Rework of finished product is prohibited. At the close of business, all spoilage, etc. is removed from the facility. Loss from spoilage is recorded on the Dump Report (NPC-IC-003)

XIV. Recall

In the event that a recall of product is required, the specific instructions in the Recall Policy (NPC-RP-001) will be strictly adhered to. Team members and their specific duties are established. The process to be followed is detailed. The Emergency Contact List (NPC-FD-009) provides the names and contact information for members of the Recall Team.

Mock recalls are conducted two times per year. The results are documented on the Mock Recall Report (NPC-RP-003).

XV. Maintenance Program

The Maintenance Policy (NPC-MN-001) explains the commitment to maintaining the buildings, grounds, and equipment of NPC in a sanitary condition. A Preventative Maintenance Schedule (NPC-MN-003) specifies the types of service and the frequency of service for the equipment and building. Detailed maintenance procedures and reports document the service performed.

Specialized equipment often requires service by outside contractors. All approved contractors are listed in a Supplier register, Approved Supplier List Support Supplier (NPC-AS-006). All outside suppliers are licensed, insured and have been trained in GHP's prior to the start of any work at NPC.

XVI. Equipment Calibration

It is the policy for NPC to calibrate all equipment to maintain accuracy of the devices. Calibration of equipment will be scheduled in accordance with the Calibration Register (NPC-CA-003). Documentation of calibration activities will be recorded.

XVII. Pest Control Program

NPC verifies the location and condition of pest control devices daily and records results on the Pre-operational Inspection Checklist (NPC-PO-003). Once a month, the QA QC Manager inspects all insect light devices and records the findings on the Monthly Pest Control Inspection Report (NPC-PC-003).

NPC contracts the pest control service to a reputable, licensed, and insured vendor. The scope of service includes inspections of the facility twice a month for interior devices and monthly for exterior devices and insect lights. Bait stations are provided around the perimeter of the building and along the property fence line. Traps are located along the interior walls.

A licensed PCO conducts the inspections. Reports are electronically filed. Any unusual condition is documented and discussed with the QA QC Manager and/or the CEO. All records are kept on site including licenses, insurance certificates, inspection reports, material safety data sheets, product labels, and a site map showing the type and location of each pest control device in use.

XVIII. Waste Management

The Waste Management Policy (NPC-WM-001) outlines the various types of waste and the methods for handling each. The Waste Management Procedure (NPC-WM-002) details the methods and responsibilities for waste removal.

XIX. Allergen Program

The Allergen Management Policy (NPC-AL-001) outlines the steps taken to limit or control allergens. The Allergen Management Procedure (NPC-AL-002) defines the procedures for management of the allergen program. The Allergen Management Checklist (NPC-AL-005) is used to verify the robustness of the program.

XX. Bio-Terrorism

The Food Defense Policy (NPC-FD-001) defines the Bio-terrorism Program for NPC and is used to develop a baseline for all security operations in NPC and its suppliers, as appropriate. A Counter-Terrorism Risk Analysis is performed at least annually. The analysis is HACCP based.

An integral component of the Bio-Terrorism Policy is the Visitor's Policy (NPC-FD-004) which defines the methods, responsibilities and records used to maintain control over visitors to NPC. A visitor must sign in to the Visitor's Log (NPC-FD-005) and

will be issued a Visitor's Badge if they enter the dock or cooler. The GHP and Food Defense policies are posted at the visitor's sign in location and visitors must read and understand the policies. By signing the Visitor's Log, visitors agree to abide by the policies of NPC.

XXI. Document Control

The Document Control Policy (NPC-EN-001) outlines the methodology for document control. It describes the numbering methodology and the methodology used when document revisions are made. The methodology applies only to documents which are used exclusively by NPC. Documents covered are those over which NPC has complete control. Documents which are not under the total control of NPC are excluded. Documents which are not subject to revision are excluded. Documents used as correspondence, such as inter-office memos, status reports, financial statements, etc. are excluded.

Many documents are used by NPC to operate as a business. Some of these documents fall under the control of other companies and/or agencies. Some are controlled jointly by NPC and another company. The remaining documents, those over which NPC exerts complete control are to be numbered if such documents are subject to revision. Documents such as a Quality Statement are not subject to revision and therefore, are not covered by this methodology.

Any controlled document is subject to revision. The methods and responsibilities for revising a control document are detailed in the Control Document Management Procedure (NPC-EN-002). In the cases of revision, an Engineering Change Notice (NPC-EN-003) will be completed listing the document, the change, the reason for the change, and the effective date of change. Approval by the CEO is required for any change to a controlled document. Any document covered by this standard requiring revision will have the date of revision noted on the document. Copies of superseded revisions will be maintained in the Obsolete Documents folder.

A Master Document Register is maintained. The Register will include document number, document title, current revision, date of last revision, date of last review and date of next scheduled review.

Electronic copies of all of the documents listed in the register will be stored off-site for safekeeping. All records are kept in storage per the requirements of the Control Document Management Procedure (NPC-EN-002).

XXII. Internal Audit

The Internal Audit Policy (NPC-IA-001) establishes the procedure, schedule, and reporting for all internal audits conducted at NPC. The Internal Audit Procedure (NPC-IA-002) defines the methods, responsibilities and documentation for conduction internal audits. All internal audits will be identified throughout all stages

of internal operations of NPC. The audit schedule and specifications are detailed in the Internal Audit Schedule (NPC-IA-004). The Internal Audit Report (NPC-IA-003) is used to document audit findings. Corrective actions are reported on the Corrective Action Preventative Action Report (NPC-PA-003).

XXIII. Food Safety Program Review

The QA QC Manager, as part of the annual food safety review process will review the Food Safety Manual (NPC-FS-077), the documents referenced in it, and the practices established by it. The details of the review are set forth in the FSMS Verification Report (NPC-FS-005). The report is provided to the CEO. The management team will use the report to develop a Resource Analysis Report (NPC-FS-006) detailing the resources required to maintain and improve the Food Safety Management System at NPC.

