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WOOLWORTHS LIMITED

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# WQA

QUALITY ASSURANCE STANDARD

**PRIMARY PRODUCTION - PRODUCE**

Version 8



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Dear Vendor,

Since 1996 Woolworths has operated its own, independently third party audited, Quality Assurance Standard. The standard came into being as WVQMS and has been regularly reviewed along its journey through the conversion into and through the versions of WQA. With the release of each version, the standard continues to be benchmarked against global standards, such that it continues to meet the requirements of the Woolworths business.

The Woolworths business is focused on the Customer. Customer expectations of Woolworths are and should be high. We need to continue delighting our Customers with our product range, where food safety and quality are a given – we are Australia’s leading retailer and in order to maintain our position as “Australia’s Fresh Food People” we are launching Version 8 of the WQA standard.

Selected Woolworths Vendors are invited to participate in the WQA program. With the latest release of the WQA standard we aim to continue focus on our strengths and improve wherever possible. Vendors supplying Woolworths Ltd are expected to maintain certification to the WQA Standard. Vendors who successfully undertake a WQA certification audit gain certification to trade with Woolworths Ltd.

Specific areas of attention in Version 8 are: Customer focus, foreign object management, food allergens, pest prevention and hygiene.

The WQA certification process continues to be ongoing and focuses on continuous improvement. The program continues to require two audits per annum, but one of these audits will now be scoped around the physical manufacturing standards (to be known as Factory Focus Audit); the second (to be known as Annual Audit) will be scoped on the whole standard. The criteria which apply to the Factory Focus Audit are indicated in the standard with an \* asterisk beside the clause number. Additional audits will be conducted in line with any major change to the product, process or service supplied to Woolworths Ltd.

WQA Certification continues to operate specific to product supplied and production / processing facility.

Woolworths Ltd looks forward to your ongoing support of the WQA standard.



Group Quality Assurance Manager

*NB: Conditions of Supply*

As a condition of supply, Woolworths Ltd requires vendors to comply with their legal obligations in all respects. **The WQA Standard is not intended to operate as a substitute for the vendor ensuring compliance with all statutory and regulatory product safety, compositional and labeling requirements.** By providing this Standard, Woolworths does not release the vendor from their obligation to comply in all respects with all statutory requirements.

**WQA Primary Production: Produce**

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## WQA Produce Scope and Certification

### ▪ RISK ASSESSMENT AND RELEVANCE

Policies and procedures shall be developed, documented and implemented **commensurate with the risk** of the product, process, facility and location of production.

Policies and procedures shall include at a minimum all elements of this standard. These shall incorporate personnel, premises, surrounds, equipment, services, and any other inputs or outputs which may impact on the safety, quality and legality of the food, service or product being grown, harvested, processed, packed, stored or transported to Woolworths Ltd.

The policies, procedures and risk assessments shall be documented, implemented and records shall be maintained.

Methods and records of validation and verification of compliance to each policy or procedure shall be maintained

All sections of the standard (including this section) are relevant and auditable unless demonstrated otherwise by the vendor for their specific circumstances. Where aspects of the standard are not implemented this shall be supported by a documented risk assessment detailing reasons for exclusion.

Photographic evidence is valuable to Woolworths to demonstrate both compliance and non-compliance to the WQA Standard. The Factory Focus Audit criteria now require photography to be supplied by our auditors to demonstrate compliance (or non-compliance) to the standard. Photography is also a valuable way of demonstrating continuous improvement. Photographic evidence should be taken by our auditors and incorporated into the audit report for the sections of the standard marked with an asterisk\*.

### ▪ SCOPE

The *WQA Produce Standard* scope covers all Woolworths Branded Produce, pre packed produce (which includes bulk, proprietary and ingredients (where applicable)) Brokers associated with the named product categories are required to be audited against relevant elements of the standard within the scope of their business. This Standard excludes Meal solutions (including freshcuts / sprouts), Nuts, Value added Produce / Seafood, Manufactured Food, Seafood, Eggs, Livestock, Service Providers and Consumer Goods. *Please see "Identify the Standard Required"*

The WQA Standard applies to businesses which have been nominated by the respective Woolworths Business Teams as part of their contractual requirements for supply. This program is by Woolworths' invitation only and no Vendor can formally engage in any part of the WQA audit process without Woolworths' consent.

The scope of audit will address the products and activities Woolworths deems appropriate for your current supply. All products are required to be compliant with all current regulations both in the country of origin and the country of sale.

As determined by Woolworths, vendors will be required to achieve and maintain WQA Certification to the Woolworths Quality Assurance Standard (WQA) in addition to any existing regulatory or voluntary audits that may be currently in place (including import / export protocols where applicable).

The scope of the WQA system each vendor shall implement shall cover all aspects of the supply chain managed by the vendor relating to Woolworths activities. The following activities shall also be captured by the audit process for produce operations:

- Planting, Growing, Producing, Harvesting
- Procurement (including raw materials), Receiving, Inspection, Processing, , Packing and all associated Storage, Warehousing and Transportation at any point in the supply chain
- Contractors / Packers / Processors engaged in the management of the above activities for products intended to be supplied to Woolworths: consideration shall be given to these operations regarding

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their direct involvement with the WQA Audit process. All suppliers (direct and indirect, local or international) of Woolworths branded products must be WQA Certified and it is the responsibility of the direct vendor to ensure WQA certification is achieved and maintained.

The head office, national or corporate arrangement in the supply of products from producing sites involved in the WQA requirements, responsibilities and functions associated with the scope of audit process shall be audited.

WQA Certification is site and product specific as nominated by Woolworths. The vendor shall inform Woolworths of any change in business circumstance e.g. change of address, change of ownership, use of contract packers or producers. Woolworth's approval is required where this change impacts the production of a Woolworths branded product. If a vendor wishes to supply a new line to Woolworths outside the current scope of the WQA Certification the request for a product scope upgrade shall be directed to the relevant Business Team.

Please refer to the glossary to assist with terminology in the standard.

▪ **WQA CERTIFICATION**

**Audit Frequency**

To ensure the WQA Quality Management System (QMS) is functioning effectively it is necessary to have the system audited on a 6 monthly basis for all nominated sites unless approved in writing by the Woolworths Quality Assurance team. As explained in the letter to Vendors, the Annual Audit is a full scope audit, but the new Factory Focus Audit is a 6monthly audit concentrating on the areas in the standard marked with an asterix\*. Maintenance of audit frequency is a condition of trade with Woolworths. It is the responsibility of each site to liaise directly with their nominated WQA Certification Body to ensure audits are scheduled appropriately and undertaken within the required timeframes to maintain WQA Certification.

**Special and/or Unannounced Audits**

The vendor agrees in advance if at any time Woolworths has concerns their WQA Quality Management System does not comply with WQA requirements, Woolworths, acting reasonably, may direct a Certification Body to carry out a Special Audit. The scope of the Special Audit will be at the discretion of Woolworths and the cost will be borne by the vendor. Special Audits will be unannounced or announced at Woolworths' discretion and may be conducted by any Certification Body nominated by Woolworths.

▪ **ETHICAL AUDIT REQUIREMENTS**

As part of the WQA Certification process, Woolworths has elected for all Vendors to participate in our Ethical Audit program in line with the Woolworths Ltd Ethical Sourcing Policy. Please refer to: [www.wowlink.com.au](http://www.wowlink.com.au) (Doing Business with Woolworths – Vendor Guide and Trading Terms – Ethical Sourcing Policy). The scope of the Ethical Audit will be at the discretion of Woolworths and the cost will be borne by the vendor.

As Woolworths continues to implement the audit component of its ethical sourcing policy we have implemented the following guidance:

- All international facilities are subject to an ethical audit as part of the WQA audit in accordance with the above criteria by an approved WQA ethical audit provider.
- Processing / Production sites in Australia and NZ will be subject to self assessment and the requirement for third party audits will be at the discretion of Woolworths.



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## 1. Company Commitment and Customer Focus

### 1.1 MANAGEMENT COMMITMENT

Senior Management shall demonstrate their commitment to the effective implementation of the requirements of the WQA Standard and shall provide the resources necessary to meet the requirements of the standard. This shall include evidence of commitment to product safety, quality and legality of all product supplied to Woolworths Ltd.

The vendor shall be familiar with all regulatory requirements associated with the specific product supplied. The Vendor shall be able to demonstrate understanding of the relevant regulatory requirements for the industry sector in which they operate both in the country of production and the country of sale.

### 1.2 CONTINUOUS IMPROVEMENT

The vendor shall recognise benchmark systems for quality, safety and regulatory compliance are continuously changing and continuous improvement is necessary. Senior Management shall facilitate the continuous improvement of the business.

A procedure shall be developed, documented and implemented to demonstrate how the company completes a review of the quality management system and implements the improvements required.

Data obtained from root cause corrective action investigations shall be used to facilitate continuous improvement in the Quality Management System.

### 1.3 WOOLWORTHS / VENDOR CUSTOMER RELATIONSHIP

A documented procedure for customer focus shall be developed and shall demonstrate the Vendor's senior management commitment to ensuring processes are in place to establish key performance indicators relating to customer satisfaction.

This shall include evidence of regular meetings or communications with Woolworth's key business managers.

### 1.4 BUSINESS CONTINUITY

Senior Management shall review the business continuity plan at least annually and more often if key resources and personnel change to ensure the plan continues to cover the Vendor's operations effectively.

*Please refer to "Develop a Business Continuity Plan"*

### 1.5 MANAGEMENT REVIEW (QUARTERLY)

- Senior Management shall review the quality management system, HACCP and the records of internal audits, corrective actions, pest monitoring and prevention, customer complaints, management of cleaning, foreign object assessment and policy objectives at least quarterly. For Vendors who supply less than 12 months of the year an equivalent review schedule shall be implemented.
- Quarterly management reviews shall include senior members of the management team representing production, technical/quality, logistics and sales/marketing (as a minimum) to ensure all areas of the business relating to Woolworths are captured.

The procedure shall ensure activities are in place to verify the effectiveness of the entire WQA Quality Management System, to ensure root cause analysis has been completed and to correct any problems identified. This can be done by developing checklists, compiling statistics, and conducting internal audits or other such methods. Any verification activity shall be routinely conducted.

Records of the review and any corrective actions shall be maintained. Records shall be made available to Woolworths Quality Assurance Department and Business Team as requested.

*Please refer to "Undertake a Management Review"*

**1.6 CUSTOMER FEEDBACK AND COMPLAINTS**

A procedure for the management of customer feedback shall be documented and implemented. This shall include a flow diagram indicating how complaints are managed. Feedback includes positive comments and complaints. Complaints shall include product rejections as well as individual customer contact.

Customer complaints may be escalated to product withdrawal and/or recall based on the investigation of the complaint and the trend data. This process shall be incorporated into the procedure.

Complaints shall be assessed upon receipt and logged by a trained business representative. Corrective action shall be promptly applied appropriate to the severity of the issue. It shall be demonstrated every effort has been made to obtain full details of the issue. Detailed records of communication with both Woolworths and the customer shall be retained showing effective and diligent complaint investigation, resolution and corrective action.

Complaint investigations shall include analytical and destructive product testing and assessment where a sample of the product can be obtained. Retention samples shall be utilised as part of the investigation. Complaint investigations shall involve internal and external experts as necessary. All steps of the complaint investigation shall be documented.

The root cause of the complaint shall be identified and documented. Corrective and preventative action shall be taken.

A prompt response for the customer shall be provided.

Upon completion of the documented complaint investigation, the document shall be signed off by an accountable senior manager.

Complaints shall be trend analysed by volume produced and complaint category as a minimum, and shall include all product produced on site as well as Woolworths branded products. Complaint data shall be used to identify root cause(s). Corrective action shall be applied to individual complaints and root cause(s) in a timely manner to reduce and eliminate reoccurring complaint levels and implement ongoing improvements to product safety, legality and quality. Trend analysis, investigations and details of individual complaints or rejections shall be maintained and available to Woolworths upon request.

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## 2. Quality Management System

Vendors shall have available access to the current Woolworths Quality Assurance Standard and related documents including Appendices, "Code of Practice (COP)" and guidance documents. The vendor shall develop, document and implement a manual with respect to the range of activities on the site as covered by the scope. This manual shall detail or reference procedures explaining how the vendor complies with all relevant requirements of the WQA standard. These procedures shall be securely stored and accessible by relevant staff when needed.

The vendor shall have a system to ensure current information associated with all food safety issues, regulations, scientific and technical developments applicable in the country of production and sale is available, reviewed and implemented where applicable.

Documentation shall be developed showing the sequence and interaction of all processes needed for the food safety and quality management system.

Where electronic systems are used, systems shall be developed to ensure effective back up in the event of system failure.

The manual shall include:

### 2.1 QUALITY POLICY

The quality policy shall outline the Vendor's objectives and commitment for supply of legal, safe and quality products, as well as meeting customer expectations. The policy shall incorporate the Vendor's commitment to food safety and detail the resulting food safety objectives. This quality policy shall be signed on behalf of the Vendor by the Senior Manager with executive responsibility.

### 2.2 DESCRIPTION OF HOW THE QUALITY MANAGEMENT SYSTEM WORKS AND IS CONTROLLED

The description shall provide explanations and procedures covering the following:

- The scope of the quality management system, which shall include food safety, product quality and legality.
- Responsibility and procedures for development of all documents including HACCP/ Process Control Plans, procedures, methods, recipes, work instructions, specifications and records.
- Responsibility for procedures for amending and authorising documents, date or version identification, ensuring only current copies are in circulation, ensuring only those personnel who need documents have access to them.
- Methods for ensuring obsolete documents are removed from circulation.
- Description of the interaction of related procedures and processes.
- Description of how and where documents and records are stored.
- Description of how all documents are protected from damage or loss.
- Description of the period of retention for documentation and records. This shall incorporate any legal obligations for record retention and shall consider the shelf life of the product including where there is a possibility the shelf life may be extended by the customer e.g. freezing. Records shall be retained for the life cycle of the product plus the shelf life of the product.
- Records for the verification of these procedures and any corrective actions to problems identified shall be maintained by the organisation.
- Responsibility for the communication to the management and supervisory staff of the importance of meeting statutory, legal and customer requirements.
- Security of the quality management system (including management of current "back up" copies).

Relevant regulations for the specific product category shall be identified, documented and be available.

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**2.3 ORGANISATIONAL STRUCTURE**

The Vendor shall develop and have available an organisation chart. The chart shall indicate the job positions within the organisation and responsibilities of these positions with respect to product safety, quality and legality. Deputies shall be designated for positions with responsibility for product safety, quality and legality. Job descriptions shall be documented for each position nominated within the organisation chart, stating the responsibilities for product safety, quality and maintenance of the quality system.

Records required by the vendors system and/or the standard shall be documented and maintained.

**2.4 DOCUMENT REGISTER**

A list of all documents including the quality manual, procedures, work instructions, forms, HACCP Plans, specifications with the date and/or version number shall be maintained. Each document shall be referenced with sufficient information to enable traceability into the quality management system. Each record requiring confirmation of a task completion shall be documented by way of a signature, not a tick. Tick sheets are not adequate and shall not be used.

**2.5 AMENDMENTS REGISTER**

Where amendments are made to any of those documents listed in the document register they shall be recorded and dated. The reason for change shall be documented. Records for the verification of all of these procedures and any corrective actions to problems identified shall be maintained by the organisation.

**2.6 INSURANCE**

A Certificate of currency evidencing Product and Public Liability Insurance equivalent to 10 million #dollars (in the currency of Australia or New Zealand as applicable) or such amount as considered acceptable from time to time by Woolworths shall be available as a controlled record. Woolworths approval will be required for any variation to this requirement relating to International Vendors.

#this may not cover costs associated with a recall and this should be discussed with your insurer, product recall insurance is a separate component to this insurance.

**2.7 SECURITY PROTOCOLS**

A procedure shall be implemented where applicable for the destruction of any Woolworths branded product or packaging which has been rejected from Woolworths, any discontinued or obsolete packaging and product not fit for purpose (including withdrawn and recalled product). This procedure shall detail the notification of destruction to the Woolworths Business Team.

Methods of secure destruction of paper and electronic quality system documentation and records shall be defined. This shall include confidential office waste where details relating to the Vendor's business relationship with Woolworths are documented.

The systems implemented shall be included on the internal audit schedule.

**2.8 FOOD FRAUD**

The Vendor shall identify any potential or known risks to the integrity of the specific product(s) supplied. The risks shall be considered on a global scale. Procedures shall be developed, documented and implemented for the control of these risks. Product supplied to Woolworths shall meet the product name and / or specification in full. Issues such as adulteration, counterfeiting, mislabeling and dilution of product either knowingly or not are considered critical non-conformances.

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### \*3. Process Control: Produce

Process Control ensures products supplied to Woolworths are processed and/or produced assuring the integrity of the product. Vendors supplying food products/processes to Woolworths shall develop, document and implement a HACCP Plan or Plans which will:

- identify potential hazards to food safety, quality criteria and regulatory criteria for both the country of production and sale,
- put in place sufficient control measures to identify, eliminate and reduce the hazards to a safe level or to eliminate the hazards

The vendor shall use Codex Principles and Guidelines to identify, assess and control any hazards which can affect the quality and safety of the product or service.

The preliminary steps to the Codex HACCP principles shall be documented covering:

- **The HACCP Team** – those members nominated by the vendor to document the HACCP Plan. In the event the vendor does not have the appropriate expertise in-house, external expertise shall be sought and used to develop and review the HACCP system. The day to day management of the HACCP system shall remain the responsibility of the vendor’s management team. Where the vendor uses external resources such as consultants or other experts’ information relating to their credentials shall be available. At least one member of the HACCP Team who is a member of the organisation shall have attended a formal HACCP training course to ensure a thorough understanding of HACCP Principles and their application (CODEX)
- **Scope** – of the HACCP Plan shall be defined describing the boundaries of the HACCP study. WQA Standard “WQA Primary Production Produce Scope and Certification” specifies the minimum scope
- **Purpose** – of the HACCP Plan shall be defined describing the general classes of hazards to be addressed. This shall include product safety, quality and legality.
- **Product Description and Intended Use**  
A document is developed covering like products and/or processes identifying the following aspects:
  - Description – product or process groups
  - Composition – full ingredient statements or reference to specifications
  - Method of preservation e.g. heat treatment, refrigeration, Packaging – primary and secondary
  - Storage, handling and distribution method
  - Shelf life
  - Intended use e.g. ready to eat, requires cooking etc
  - Special labelling – e.g. Any criteria outside Food Standards Code or industry requirements, for example: Refrigerate after opening, wash before use etc.
  - Sensitive consumers

The document shall be developed to provide a general description of similar categories or groups of products. Each product, different category or group will require a separate document.

- **Flow Chart** – All major steps in the process shall be identified in a flow chart along with the inputs where they occur. Process inputs may include water, packaging, chemicals, preservatives, rework and other ingredients. Where a product or process requires a specific step procedure or handling method, a new flow chart shall be developed. The flow diagram shall be verified by the HACCP team to ensure its accuracy.

The documentation shall cover the seven principles of HACCP which are:

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- **To conduct a hazard analysis** – this assessment shall be documented and identify all potential biological, physical, chemical, quality hazards and regulatory issues associated with products and processes at each step in the flow diagram. Hazards considered shall also include allergens. These hazards shall then be assessed for significance and wherever a significant hazard is identified, one or more control measures shall be developed. Potential issues such as irregular climatic conditions, dioxins, *E. coli* O157:H7, chemical treatments / contamination, shall also be considered. Emerging issues shall be considered as they develop.
  - **Determine the Critical Control Points** – for each significant hazard the Vendor shall determine which of the control measures developed is the critical point for control of the hazard, including significant quality hazards/regulatory issues.
  - **Establish critical limit(s)** – the limits for each critical safety, quality and regulatory control measure shall be established and documented. Where these limits are not available through industry standards or published research the Vendor shall undertake a validation study to ensure the limits set are controlling the significant hazard. Validation data shall be maintained.
  - **Establish a system to monitor control of the CCP and QCP** – procedures for monitoring the critical limits shall be developed, documented, implemented and reviewed. These shall include details of what is being measured or monitored, how this is to be carried out, the frequency at which measurements will be undertaken, where the monitoring activity is to be undertaken and who is to be responsible for monitoring. Monitoring activities shall be undertaken regularly so any deviations can be detected in-line and corrected immediately.
- \*Records of monitoring of CCPs and QCPs for both safety and quality hazards shall be maintained and shall be signed by the persons responsible for the monitoring activity and by a responsible reviewing official of the business.**
- **Establish the corrective action to be taken when monitoring indicates a particular CCP or QCP is not under control** – where monitoring indicates a deviation from critical limits procedures shall be developed, documented and implemented to bring the process back under control and list personnel responsible for the corrective action. Procedures shall also include disposal of any product affected by the deviation and identify personnel responsible for assessing product. Records of both the process correction and product disposal shall be maintained as part of the HACCP records.
  - **Establish procedures for verification to confirm the HACCP system is working effectively. The vendor shall ensure senior management review the food safety system and HACCP verification. The review shall be documented and include the following procedures and activities:**
    - A schedule of microbiological, chemical and organoleptic testing (as applicable) to confirm CCP's and QCP's are in control for all products. The schedule shall include the type of testing and the frequency of testing. This will be determined by the risk nature of the products and processes. Records of all testing shall be maintained.
    - A schedule of shelf-life verifications covering microbiological, chemical and organoleptic testing (where applicable). The schedule shall include the type of testing and frequency of testing. Records of all testing shall be maintained.
    - A schedule of physical product evaluations against specifications. Methods for assessment, responsibilities and frequency of assessment shall be defined. Records of assessments shall be maintained.
    - A schedule for reviewing monitoring and corrective action records
    - A schedule for reviewing customer complaints relating to food safety and quality
    - A schedule for internal audits, to be conducted on a 6 monthly basis or equivalent. Refer to the validation /verification element (internal audits) of the WQA Standard
  - **Establish documentation concerning all procedures and records appropriate to these principles and their application** – in accordance with information outlined above.
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In addition to the requirements of the Codex Principles and Guidelines the vendor shall:

- **Establish procedures for reviewing HACCP Plans where any changes occur** – any changes to process or production may introduce new hazards or changes to the significance of existing hazards. A procedure for full HACCP Plan review in the event of changes shall be documented and implemented.
- **Product Design and Development (applies only to Woolworths Branded Product)**

A procedure shall be documented and implemented for product design and development which includes the following minimum requirements where applicable:

  - Review of HACCP and risk assessment and amendment where necessary
  - New products shall be designed to ensure product safety before being presented to Woolworths.
  - Raw materials used in the product development process shall be commercially available to the Vendor and meet the requirements of the Approved Supplier Program.
  - Production trials (samples shall be submitted to Woolworths and approved prior to products being launched to market)
  - Raw material and finished product specifications (including labeling and allergen information) shall be retained to meet the requirements of this standard.
  - Product and Process Validation (including all associated claims)
  - All product and claims shall be approved by Woolworths prior to products being launched to market. Supporting documentation is required to validate all claims.
  - Realistic shelf life establishment in final packaging and through final commercial process, reflective of realistic end to end supply chain storage conditions, and account for consumer handling.

Shelf life trials shall be undertaken using documented protocols. These shall consider inherent product safety, handling, potential pathogens, and spoilage and quality indicator organisms. Actual production samples shall be tested for relevant chemical (e.g. MRL) and organoleptic parameters. Samples shall be monitored throughout the trial. Trial results and sample storage conditions are to be documented and maintained. Worst case raw materials (i.e. end of internal shelf life) shall be used when making samples to establish final product shelf life.

The maximum shelf life shall be determined on the basis of maintenance of product safety characteristics e.g. organoleptic attributes and microbiological (where applicable), whichever is the shorter. A safety margin should be deducted from the maximum shelf life.

All product samples submitted to Woolworths shall be fit for human consumption for the duration of the indicated shelf life.

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## 4. Specifications and Packaging

Product specifications are legal documents which must fully describe the product and its' attributes. Vendors shall ensure the information contained within the product specification is accurate, complete, and reflects the product supplied and approved for purchase. Vendors have an obligation to ensure all products supplied are fully compliant to the specification. This includes all safety, quality and regulatory aspects (including import / export protocols). Vendors shall have access to current specifications for every product produced.

Vendors are responsible for ensuring all ingredients or additives used (whether from chemical or natural sources) shall be permitted for use with the product being supplied. This includes any products which may be in contact with the food at any time in the process. Legal permissions are different for different types of product. Vendors shall demonstrate the raw materials and/or additives used are permitted in each individual product concerned.

### 4.1 SPECIFICATION CRITERIA (ALL SPECIFICATIONS)

Where specifications are developed by the vendor, each specification shall detail all relevant information for the product. The specifications shall include the following minimum information:

- Core Details
- Product Details
- Supply Details (name and location of producer and vendor) (where applicable)
- Batch Number, date code and traceability details
- Product formulation
- Processing aids
- Raw material sources
- Ingredient statement in accordance with the labelling laws of the country of sale,
- Regulatory labelling in accordance with labelling law requirements of country of sale e.g. GMO, Irradiation, Allergens, Country of Origin, Caution/ Warning Statements, MRLs etc (Note GMO is not permitted in Woolworths brands, all Woolworths branded products shall be non-GM)
- Product claims
- Allergen cross contact
- Packaging information
- Transport, display, storage and handling criteria
- Shelf life (including shelf life of raw materials, where applicable)
- Information regarding the safe handling or use of the product
- Product preparation details
- Customer storage instructions
- All quality parameters including sensory and physical criteria and/or directions for use
- All safety parameters (including microbiological and chemical criteria)
- Methods of preservation
- Nutritional Information Statements for foods (where applicable)
- Requirements for importation into country of sale.

Specifications which do not contain the necessary information will require revision and amendment to ensure all parameters are adequately defined.

All specifications shall be reviewed whenever the product, ingredients or process changes or at least every 12 months. Updates shall be communicated to Woolworths to allow any changes to be agreed prior to updated product being commercially available.



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**4.2 WOOLWORTHS SAMPLE SUBMISSION SPECIFICATION (SSS)**

Where Vendors are tendering for business and a Woolworths finished product specification does not yet exist the Woolworths sample submission specification shall be completed and retained on file for all products supplied to Woolworths. (Refer to Woolworths website: Standards and Compliance section ([www.wowlink.com.au](http://www.wowlink.com.au)))

**4.3 WOOLWORTHS CONTROLLED PRODUCT SPECIFICATION**

For Woolworths Branded Products, a Woolworths issued finished product specification shall be included in the Quality Management System. These specifications shall be current, available on site at all times and document controlled. The Vendor shall demonstrate all relevant data has been supplied to Woolworths in accordance with any agreed timeline to facilitate the development of the Controlled Product Specification.

**4.4 PACKAGING**

All packaging shall comply with legislation in country of production and sale as appropriate. Product packaging for all products (Including Woolworths Branded) shall be appropriate for the intended use e.g. food grade and sustainable for the shelf life of the product. Packaging shall be selected and specified with consideration of any foreign object risks presented by the packaging. These risks shall be eliminated or controls implemented. Product shall not be supplied in superseded packaging.

Packaging shall be in accordance with Woolworths Supply Chain Packaging and Barcode Specification Documents (available on [www.wowlink.com.au](http://www.wowlink.com.au))

Procedures shall be designed and implemented with documentation maintained to confirm the following:

- Packaging complies with relevant food safety / product legislation and suitability for use, including materials in contact with food requirements.
- Where modified atmosphere is used the suitability of the gas mix shall be validated for the shelf life of the product and appropriate control systems shall be in place to manage the delivery of food grade gas to each pack. Seal effectiveness shall be monitored.
- Any partially used packaging materials transferred from production lines shall be effectively protected prior to being returned to storage.

For Woolworths branded product packaging the following is required:

- Packaging specifications for all packaging used
- Woolworths written approval for all packaging materials used.
- Written approval from Woolworths for any packaging changes before they are made.
- Procedures to demonstrate compliance to the Woolworths packaging specifications.
- Control of surplus packed product and packaging. Excess finished product shall not be given to staff or sold through factory shops etc Excess packaging shall be securely disposed.

**4.5 PURCHASED INPUTS (RAW MATERIALS)**

Specifications shall be available for all purchased inputs used to produce the product. The specification shall be current, document controlled, part of the quality management system and reviewed when changes are made to product, supplier or process but at least every 12 months. The specification shall show compliance with food safety and legislative requirements. The specification shall be agreed between the Vendor and the purchased input supplier.

These specifications shall include:

- Product name
- Ingredient statement in accordance with labelling laws of the country in which the product is to be sold (where applicable)
- Packaging specifications, including tamper protection (where applicable)
- Transport, storage and handling criteria

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- Shelf life (where applicable)
  - All quality, regulatory and safety parameters (including microbiological / chemical / physical criteria and allergen content and cross contamination status) e.g. Material Safety Data Sheet (MSDS)

**4.6 WORK IN PROGRESS**

The Vendor shall document internal work in progress specifications for all materials which are combined in an assembly step to produce a finished product. The documents shall be subject to scheduled review and shall detail all relevant product safety, quality and regulatory criteria.

## **\*5. Control of Product**

### **\*5.1 PRODUCT IDENTIFICATION**

The Vendor shall document and implement procedures to ensure all materials used in or produced by production processes are clearly identified. Identification may be through on-product labeling, coding or IT management systems.

Materials used in or produced by production processes include:

- Raw materials
- Processing aids
- Packaging (primary and secondary)
- Work in progress
- Rework
- Waste materials
- Non-conforming product
- Finished products
- Chemicals (including cleaning, pest prevention, and agricultural chemicals)
- Other materials e.g. gases, ice

Finished product identification shall be through product date marking and / or batch marking. Coding used shall enable identification of the retail sale unit **and** the shipper / carton such that product may be identified and recovered at both consumer level and whilst in distribution.

All coding systems used e.g. date code or lot code marking shall be both legible and indelible. Best Before and Use By date coding shall be in accordance with the regulatory requirements of the country of sale.

### **\*5.2 TRACEABILITY**

A procedure shall be developed, documented and implemented such that all material and inputs are traceable through all stages of the site's processes.

All raw material (including seedlings and packaging) shall be forward traceable through all stages of the process to its use in a product.

All work in progress material shall be traceable forwards and backwards.

Quality System records and all relevant production records in relation to the process shall be identifiable to specific production.

All finished product (including seedlings and packaging) shall be backwards traceable through all stages of the process to all raw materials and inputs used. Each individual raw material and its supplier shall be identifiable.

All finished product shall be traceable through the product distribution chain until delivered to a Woolworths Ltd store or distribution centre.

All product shall be traceable through information on both the retail sale unit and the shipper packaging. The traceability system shall be audited at a minimum frequency of 12 monthly across the groups of products produced or handled. The audit shall test the system both forwards and backwards and incorporate a mass-balance check. Records of the audit showing all steps shall be maintained and corrective actions shall be applied as required. The traceability exercise should be completed within 4 hours.

### **\*5.3 WASTE, RE-WORK AND WORK-IN-PROGRESS**

- Waste, re-work and work in progress shall be identified at all times in the process.
- Systems for controlling waste, re-work and work in progress shall be documented with records maintained. Systems shall prevent product contamination by waste products. Waste products include process waste and waste as a result of non-conforming products.
- Procedures for disposing of waste (including food product waste intended for use as animal feed) shall meet relevant legislative requirements.

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- Waste (including work-in-progress, material out-of-spec and non-conforming product) shall be clearly identified and segregated for storage and/or disposal.
  - Waste shall be stored such that it is not a source of contamination and frequently removed from site.
  - Used packaging materials and consumables shall also be considered as waste.
  - All non-conforming products which may have a food safety concern (including material recovered from product withdrawal / recall and its packaging) shall be destroyed securely with records maintained.
  - Suitable identifiable waste containers or collection systems shall be used in production areas. These containers shall be cleanable, leak and spill-proof, emptied and cleaned by designated staff on a regular basis or as required. The cleaning operation shall not pose any contamination risk to product.
  - Containers used for raw material, WIP or finished product storage or handling shall not be used for waste.
  - If food handlers are required to handle waste, procedures shall be in place to remove any risk to product before returning to food handling duties, which may involve a change of protective clothing.
  - Waste pending collection from site or disposal shall be stored in allocated areas.
  - Waste storage capacity on site shall be suitable and sufficient for all materials in between collection from site. The frequency of waste collection shall be adequate for the site's needs.
  - Records shall indicate the quantity or volume of waste collected for destruction or secure disposal.
  - Effective pest prevention methods shall be in place for waste handling systems and waste storage areas.

**\*5.4 DROPPED PRODUCT**

Control procedures shall be documented and implemented for any food product which is dropped on the floor or other non-food grade or un-sanitised surface e.g. washing or packing. Waste or by-product shall not be allowed to accumulate on the floor or any other areas..

**\*5.5 NON-CONFORMING PRODUCT**

The Vendor shall develop, document and implement procedures to identify and manage items at any stage of the process which are found to be out of specification.

- Assessments and decisions regarding non-conforming product shall only be made by authorised, trained and accountable personnel.
- All staff shall be required to report non-conformances or any concerns regarding products. There shall be a mechanism in place to facilitate this reporting.
- All non-conforming products (including that to be re-worked) shall be clearly identified and securely stored to prevent accidental use.
- The reason for non-conformance shall be clearly documented and corrective action applied
- Instances of non-conforming product shall be communicated to the source of the issue and corrective action applied. This includes the raw material supplier or an off-site process where relevant.
- Non-conformances shall be subject to trend analysis to identify ongoing issues. Records of reuse or destruction of non-conforming material shall be maintained.

**\*5.6 STOCK ROTATION**

A stock rotation policy and procedures for raw materials, work in progress and finished product shall be documented and implemented to ensure the oldest products or materials are used first, and out of date materials are not used.

Where ingredients e.g. chemicals are used as a component processing aid of a product the shelf life of the finished product should not exceed the shelf life of the raw materials unless validation is available to support the safety and quality of the finished product.

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The impact of worst case scenario raw material age and work in progress should be understood, validated and specified in documentation.

Where a product is sold with multiple individual components (e.g. an additional garnish or component used to prepare the product by the consumer) procedures shall be in place to ensure the stated shelf life of the components does not exceed the shelf life of the finished product.

**\*5.7 CONTROL OF CHEMICAL AND PHYSICAL PRODUCT CROSS CONTAMINATION**

Procedures for prevention of cross contamination shall be developed and implemented. These shall be documented and consideration shall be given but not limited to the following:

- Training of staff responsible for working with approved chemicals e.g. cleaning chemicals. Recognised Government Approved Industry Training in agricultural and chemical applications e.g. Chemcert, Growsafe (NZ) or equivalent training
- Contamination from extraneous packaging
- Contamination of products with specific on-pack claims (e.g. organic products) with raw materials, finished products or equipment which has been used to produce or process standard products
- Contamination of finished product with non-declared allergens
- Contamination of product with non-permitted food additives or processing aids (/ pesticides / or other chemicals) for the product type
- Contamination from cleaning and / or sanitation activities or from cleaning, pest control, maintenance or other chemicals
- Separation of raw materials and finished products
- Storage of materials at different stages of process
- Separation of utensils used for preparing raw materials and finished product.
- Changeover of packaging between differing product types by means of line clearance
- Use and management of harvest / transport vehicles (where applicable)
- Management of building or maintenance work
- Where the use of chemical which may taint is unavoidable, e.g. for scheduled maintenance or building work, controls shall be implemented to protect product from taint or physical contamination.

All chemicals used shall be permitted for use on the type of product being treated.

- Current Material Safety Data Sheets (MSDS) shall be available for all chemicals used; documentation shall demonstrate suitability for use.

**5.8 CALIBRATION**

The Vendor shall develop, document and implement a procedure to ensure all equipment used to inspect, measure or test the product or process is reading accurately at the time of use. The procedure shall address the following:

- A list identifying all inspection, test and measuring equipment including, but not limited to thermometers, temperature gauges, scales and balances, temperature controllers/recorders, metal and foreign object detectors, chlorine measuring equipment, colour measuring equipment, pressure sensors, heat sensors, chemical application equipment (including farm), water monitoring, reference weights, refractometers etc.
- How the calibration equipment is identified and where it is located
- Recognised methods and frequency for calibration and calibration checking based on volume of product produced. Farm chemical application equipment is required to be calibrated at least annually
- Acceptable degree of accuracy
- Details of how the calibration equipment is traceable to a known reference standard
- Special conditions for the operations, storage or handling of calibration equipment
- The identification of equipment when it is found to be out of calibration
- Methods for identification and review of product produced whilst equipment has been out of calibration

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The Vendor shall maintain records of calibrations, calibration checks and any corrective actions taken when equipment is found to be out of calibration; the records shall also show who is responsible for each activity.

**\*5.9 PRODUCT TRADE MEASUREMENT (WEIGHT / VOLUME / COUNT MEASUREMENT)**

▪ **Woolworths Brands**

For all Woolworths branded products, any given unit shall meet the minimum net weight / volume / count as declared on the package label or as per Woolworths requirements. Sampling plans and verification checks shall be implemented to verify compliance to these criteria.

Written approval from Woolworths is required for the use of the Australian National Trade Weight and Measurement AQS system.

**All Woolworths branded finished retail packed product shall be subjected to 100% inspection using check weighing systems to demonstrate compliance to label weight.**

▪ **Bulk Supply and Proprietary Brands**

Processes shall be implemented to ensure products meet the requirements of the Trades, Weights and Measures criteria or equivalent acceptance criteria in the country of sale.

▪ **General Requirements**

Where data is captured from electronic on-line check weighing systems, the data shall be retained, retrievable and verified at a suitable frequency based on volume of product produced.

Reports supporting the checks in place including both process control checks and end product verification shall be maintained.

Procedures shall be in place to calculate and verify packaging tares used at a suitable frequency to ensure the actual product net weight / volume is measured accurately.

▪ **Legal Verification**

**Australia:** Sampling plans and verification checks should be based on the 12 sample protocol where the average shall be above the declared net weight / volume and no one sample is permitted to be greater than 5 % under the prescribed net weight / volume.

**New Zealand:** Sampling plans and verification checks for product to be sold in NZ shall ensure all packages meet the three Average Quantity System rules under New Zealand legislation.

**5.10 PRODUCT RELEASE**

There shall be a procedure developed, documented and implemented for the formal release of finished product. Positive release criteria can be sensory, chemical, physical, temperature or visual. All relevant criteria shall be considered by the vendor in relation to the product type.

Analytical positive release criteria shall be implemented where available and practicable. Vendors shall develop and implement a testing frequency and sample size based on product safety risk and historical supply.

Where positive release criteria exist, product shall not be released until all testing is complete with compliant results documented.

The product release procedure shall ensure all system requirements relating to product safety, quality and regulatory aspects have been completed. The release procedures shall demonstrate all finished product meets regulatory requirements both in country of production and country of sale.

Authorisation for release shall be documented and approved by a trained, accountable representative of the Vendor.

Non conformance to any criteria defined in the Woolworths product specification shall be communicated formally to Woolworths QA Team in writing, with a proposed action plan to ensure product compliance.

## 6. Product Labelling and Artwork

Woolworths have prescribed labelling requirements for both retail and outer product packaging to ensure maximum traceability. A current copy shall be available and implemented for the products supplied to Woolworths. In addition to the labelling requirements defined in the individual product specifications, the following also apply, unless otherwise specified from Woolworths in writing. All labelling shall be clear and legible and this shall include:

- Prescribed Names
- Product names on retail packs or cartons; which shall conform to the regulatory requirements of the country of sale and the product name as listed on Woolworths Specification or agreed with the Woolworths Business Team.

The outer package and or / shipper of the product shall also have the following clearly labelled as a minimum:

- Vendor name and address and product name
- Net weight / number of units
- Date code / batch code / producer traceability code
- Country of origin

Imported Product shall include all of the above as applicable but shall also include the following:

- Lot Code
- Name and business address of the Importer

All products shall be labelled with a date code / batch code in accordance with the relevant regulatory requirements or as specified in the Woolworths product specifications.

Unless otherwise specified in writing, all Woolworths branded and proprietary product are required to identify a 'Best Before' date code or a 'Use By' date code depending on the food safety risk status and perishable nature of the product type.

All labelling shall be legible and indelible. All Woolworths' branded and proprietary branded products shall be labelled in accordance with the food labelling requirements of the relevant country of sale.

*Please refer to "Apply a Use by Date" and "Identify Regulatory Requirements"*

The Vendor shall document and implement a procedure for preparing and reviewing artwork and labels. This shall include where applicable:

- Confirmation the product label / artwork complies fully with the relevant regulatory, industry and recognised code of practices.
- Confirmation the Woolworths branded product labels / artwork complies with specifications
- Woolworths approval for all Woolworths branded product labels / artwork is available prior to the packaging being printed. This approval shall be retained and be available on request.
- Current Woolworths approved artwork is only used for packing Woolworths branded products.

Formal documented artwork / label reviews shall be conducted:

- On a minimum annual basis.
- Where a new product is being developed.
- Where a change in production process is proposed.
- If there is a change in product recipe or allergen status.
- Where there is a change in raw material suppliers.
- Where changes to labelling laws are proposed.
- Where a regulatory complaint has been raised.
- If new ingredients are introduced onto the production site.
- If there is a change in the allergen status of any material handled on site.

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- If there is evidence of new or emerging hazards.

Where Woolworths branded artwork is required to be updated as a result of the review, this is required to be communicated to Woolworths with details of the change required in advance of the change being implemented. Vendors shall demonstrate compliance of current and subsequent production to regulatory requirements. Records shall be maintained.

Procedures shall be developed, documented and implemented to ensure product is packed into the correct and current packaging, both retail pack and shipper. These procedures shall include:

- Methods of control of packaging storage in warehouse. Obsolete product shall be securely stored and then disposed of in a timely manner
- Control of packing lines and /or equipment such that previous product packaging is removed before commencing new product type
- Control of packaging changeovers where labels etc are required to be replenished during a production run
- Methods of verification of correct packaging during packing runs at frequency determined by volume and speed risk assessment. The frequency needs to be sufficient such that if a mistake was made, product is still in the Vendor's control.
- Control of any additional printed information (printed on or off line) such as ink jet date codes or additional labels
- Control of multi-packs and variety packs both inner and outer
- Control of retail saleable units into outer (shipper) packaging and associated labelling identification

Vendors are required to demonstrate legal compliance at all times and as such regular reviews are to be conducted of packaging. Reviews of all labels shall be conducted at least annually and records of all reviews shall be maintained, including evidence of Woolworths approval for Woolworths branded products. Issues identified with the product label shall be communicated to Woolworths.



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## **\*7. Approved Supplier Program**

### **7.1 PURCHASED INPUTS**

Vendors shall have a documented Approved Supplier Program in place for all suppliers of product which is packed, processed or distributed to Woolworths and shall ensure all purchased inputs comply with all regulatory requirements of the country of production and sale.

Contract packers and in process storage facilities are considered a purchased input. These business are required to hold current supplier approval (including recognition through audit scope) to pack, process and supply Woolworths branded product from all of the direct Woolworths Vendors they service.

Formal agreements shall be obtained for any contract service used by the Vendor. These agreements shall demonstrate that food safety, quality and regulatory aspects have been addressed with effective control measures documented and implemented where necessary.

### **7.2 RISK ASSESSMENT**

A documented risk assessment shall be carried out to assess each purchased input (or group of similar inputs) for safety, quality or regulatory hazards. The purchased input and the supplier shall be assessed. The minimum risk assessment criteria are:

- The level and type of processing that is applied to the purchased input.
- The format of the purchased material.
- The direct affect the quality of the input has on the quality of the finished product.
- Risks which may have a direct impact on finished product safety and quality including allergen content or cross contamination, microbiological loading, chemical contamination and foreign object contamination.
- The volume and/or frequency of the purchased input.
- The inherent safety of the product or service.
- The geographical origin of the raw material.

### **7.3 SUPPLIER APPROVAL PROCESS**

The process for selection of a new supplier and ongoing approval of an existing supplier shall be documented and implemented.

The approval process may utilise more than one approval method but it shall be based on the risk assessment.

A list of suppliers/products and their current status shall be maintained and be accessible at point of receipt of goods or service.

The following shall be documented:

- The approval criteria used for each supplier / purchased input.
- Records of within date certificates and scope of certification where independently audited food safety or quality certification programs are used.
- Records of supplier audits (second party audits), their reviews and closure of corrective actions.
- Evidence of auditor competency where supplier audits are conducted.
- Questionnaires and technical review of the supplier's responses (if used).
- Methods of review and verification of the results shown on Certificates of Analysis where these are provided by the supplier. Note these shall be per delivery/batch purchased.
- Methods for removal of suppliers from the approved supplier program.
- Methods for use of "emergency suppliers", the circumstances in which these are permitted and any specific process controls required.
- Methods for technical review of raw material, finished specifications or the service contract.
- The frequency of review of approval method for each supplier. This shall be a minimum of every three years.
- Methods of ensuring suppliers communicate any changes which impact or may impact on a purchased input's safety, quality or regulatory attributes.

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The approval process(es) used shall ensure suppliers are operating hygienically with effective food safety and quality management. Vendors shall demonstrate their suppliers operate effective traceability.

Vendors shall demonstrate sufficient knowledge of the raw material supplier's product and process to make a judgment of the risk category. The higher risk the product presents to the Vendors product or process, the more information the Vendors shall be expected to hold.

Woolworths may choose to audit raw material or packaging suppliers who supply material for Woolworths branded products. Vendors are still expected to hold their own supplier approval in this instance.

#### **\*7.4 MONITORING INCOMING PURCHASED INPUTS**

Where the risk assessment has identified a purchased input could be a safety, quality or regulatory hazard, a method of controlling the risk shall be developed, documented and implemented to control the hazard.

A monitoring plan shall be developed to assess compliance of purchased inputs to raw material specifications. The methods of assessment shall be documented and records of the evaluations maintained. Where incoming goods or services do not meet specification, corrective actions shall be documented, and records shall be maintained including the resultant action applied to the affected raw materials.

The evaluation documentation shall include the following:

- Confirmation of compliance to all relevant regulatory requirements in the country of production and the country of sale.
- Assessment and approval in accordance with the approved raw material specification.
- Quantitative parameters of acceptance/rejection criteria (from specification).
- Methods of assessment of incoming goods, including inspection levels and type of test (destructive, visual, analytical).
- Collection and use of retention samples
- Products requiring temperature control, Code labelling and date marking requirements including date of receipt and stock rotation methods.

#### **\*7.5 ONGOING SUPPLIER PERFORMANCE MONITORING**

The vendor shall document and implement procedures for performance review of approved suppliers. Records shall detail any actions taken (e.g. cease purchase, increase surveillance and monitoring, positive feedback on performance). Where applicable these shall include microbiological and chemical testing to verify conformance to raw material specifications. The frequency for review shall be documented, and shall be based on risk and purchase history. Any review meetings held with suppliers shall be documented and actions closed.

#### **7.6 IMPORTED PRODUCT**

A verification program shall be in place for imported product. This shall ensure product sourced is safe, meets the specified quality requirements and complies with all regulatory requirements. Verification programs shall include product testing, review of quality management systems, regulatory compliance checking and quality assessment of product. Product shall be handled in an appropriate manner to ensure integrity is not compromised in any manner. The QMS shall ensure Customs, Quarantine, Warehousing and Transportation are addressed. It is the responsibility of the International Vendor to ensure all deliveries to Woolworths are managed through an effective QMS.

#### **7.7 BROKER**

Product managed by a brokerage arrangement shall be included in the Vendor's approved supplier program. Methods of supplier approval and ongoing assessment shall encompass product testing,

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reviews of quality management systems in place, and regulatory and quality assessment of actual product. All suppliers of Woolworths Branded product shall participate in the WQA Program.

**7.8 WOOLWORTHS BRANDS**

**All ingredient suppliers of Woolworths Branded products shall have in place a third party certified HACCP program, preferably GFSI recognised.** Verification may be in the form of certificates of analysis; on-site audits conducted by the vendor or recognised 3<sup>rd</sup> party certification. All contract packers used by Woolworths vendors are required to participate in the WQA Program for supply of all Woolworths branded products. Vendors shall inform Woolworths of these contract arrangements and shall demonstrate communication and approval from Woolworths before supply commences. Vendors shall ensure the approved supplier maintains WQA certification.

**7.9 CATEGORY CRITERIA**

All approved suppliers of purchased inputs are required to meet the minimum criteria listed by category in APPENDIX 4.

Woolworths may require some Vendor approved suppliers to achieve WQA Certification. This will be product risk and category dependant and will be discussed with the vendor.

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## **\*8. Premises / Facility**

The premises shall be designed, constructed and maintained **commensurate with the risk** of the product or process supplied to Woolworths. The site shall be registered with and approved by the relevant regulatory bodies where required.

The requirements in this section shall be implemented to the extent possible by the nature of the Vendor's operation. Where the requirements are not practical to implement, the Vendor shall be able to demonstrate control of the quality and safety of the product.

### **\*8.1 STAFF FACILITIES**

Adequate facilities shall be made available to accommodate the number of site personnel, including visitors and contractors. The facilities shall be managed to prevent cross contamination and be maintained in a clean condition. The following aspects are required to be addressed based on product risk:

- Changing facilities should allow direct access to production, storage or packing areas as relevant
- Toilet facilities should be available within walking distance of all food related activities but shall not open directly to production facilities, except where unavoidable in open fields.
- Adequate hand washing facilities shall be provided throughout the production facility, including staff rest areas and toilet facilities. Hand wash stations should be located to facilitate hand washing before starting work. Hand washing taps should have non-contact operation.
- All hand washing facilities shall have liquid soap, a supply of potable water and a clean method of complete hand drying such as single use towels. Towels should be contrast coloured where possible. Bins shall be provided for disposing of hand towel waste. Bins shall be large enough to accommodate the volume of waste generated, and emptied regularly. Bins shall be open or if lids are considered necessary be non-hand operable. Hand sanitisers should be provided.
- Clean protective clothing, footwear and hair covering shall be available for use prior to entry to the facility where applicable. Designated covered bins or containers shall be available for the disposal of soiled protective clothing.
- Adequate locker/storage facilities for personal effects including street footwear and clothing shall be supplied. The facility should enable outdoor clothing to be stored separately from protective clothing. For field workers vehicles, portable restroom storage is satisfactory as long as secure.
- Adequate designated areas for eating, drinking and rest should be provided.
- Refrigeration facilities for storage of personal food e.g. for lunches shall be available. These shall be maintained in a clean condition.
- Designated smoking facilities shall be provided as permitted by law and be located away from product handling or storage areas. Smoker's areas shall be controlled to prevent contamination risk to product. Facilities for handling smoker's waste shall be provided in the smoking facility. Hand washing facilities shall be available for use after smoking.
- Catering facilities shall be managed such that the site's product is not contaminated and the food is safe for staff to consume.
- Where staff have access to outside rest areas these shall be maintained in a clean condition.

### **\*8.2 USE OF SIGNS**

Signage shall be displayed and maintained in a manner which prevents the risk of product contamination, i.e. washable or presented in a cleanable display case.

Signage shall be understandable by everybody on site. This may mean the use of multi-lingual or pictorial/graphical signage.

Signs shall represent current site procedures and shall be dated.

Signage shall be used to prompt hand washing.

### **\*8.3 PREMISES EXTERNAL ENVIRONMENT**

The following shall be considered based on the site location and product risk:

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- The site boundaries shall be clearly defined, cleared from potential to harbour pests, and adequate drainage shall be in place
  - Agricultural production and raw sewerage flow into irrigation water sources
  - Maintenance of the external site surrounds, including driveways and foliage areas.
  - The use of skips, waste bins and provision of external waste storage areas.
  - The external storage of plant and equipment. This shall be minimized, and if external storage is necessary the site is required to demonstrate how the storage area is effectively managed.

Where a risk is identified then controls shall be put in place.

#### **\*8.4 PREMISES CONSTRUCTION AND LAYOUT**

The following shall be considered based on the site location and product risk:

- Management of available space for the activities on site
- Segregation of high and low risk areas of production including cool rooms, other storage areas and service areas e.g. wash down or crate wash areas
- Design and construction to minimise accumulation of dirt, debris and pests
- Walls, floors and ceilings shall be impervious, sealed and easily cleaned and maintained to eliminate any risk of contamination.
- Adequate drainage for the site's activities. Process water shall be channeled direct to drain, or otherwise managed as water shall not be allowed to pool in production areas. All drains and drain covers in wet process areas should be accessible for cleaning. Covered drainage in wet areas shall be in place, providing adequate outflow.
- Lights shall be covered wherever they could shatter and contaminate product. This includes strip light tubes on electric fly killers, where used. Adequate lighting shall be provided for clear working visibility.
- Facilities(both internal and external) associated with product storage and processing facilities shall minimize potential contamination associated with dust, pests and foreign material during processing and packing operations
- Adequate ventilation and/or extraction shall be provided to minimise condensation or process dust, or these aspects shall be otherwise controlled
- Extraction and refrigeration units (where used) shall be clean and effective
- Air should be filtered where necessary
- All process and storage areas from receivals to despatch should be considered with regard to minimising potential for product contamination. This includes accessibility to plant and equipment for cleaning and maintenance.
- Flammable materials shall be stored in secure areas, properly enclosed and adequately ventilated. Signage shall be used to identify the area and materials.
- Chemicals (including fertilisers) used on site shall be identified, controlled and stored in a secure area. All non-food chemicals used on site shall be suitable for use in a food environment and used by trained staff. Chemicals in use in production areas shall be identified and controlled at all times.
- All incoming service lines such as gas, electricity, hot and cold water shall be adequately protected and clearly identified. A map of service distribution on site shall be available.
- Suitable and sufficient refrigeration and/or cooling capacity is required to enable cooling to occur, meeting or exceeding food safety regulatory requirements. Any deviations shall be fully validated with ongoing verification.
- Where natural or artificial light is utilised it shall be sufficient to enable safe operations to produce a product which meets all relevant requirements e.g. specifications.

#### **8.5 LABORATORIES**

- Laboratories shall have capability for the analyses required and have a Quality Assurance system in place to support their results e.g. NATA, ILAC, or other equivalent validation scheme
- Laboratory methodologies shall be traceable and documented for all analyses carried out on site. Information shall be retained to support the method selected.
- On site laboratories shall be segregated from production areas
- Good Laboratory Practices (GLP) shall be implemented in all on site laboratories

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- Pathogen testing should be contracted off site or shall be carried out in areas physically segregated from production areas. A documented risk assessment shall be available to support the segregation principles used.
  - Laboratory waste and sampled product shall be disposed of appropriately. Product sampled in a laboratory shall not re-enter the food chain. Waste management procedures shall be documented and implemented and take account of both hazardous and non-hazardous laboratory waste.
  - There shall be sufficient storage capacity for sample storage at correct temperature pre, post and during analysis.

**\*8.6 WATER QUALITY**

Water quality can affect the safety or quality of a product or service and shall be tested for safety wherever it is being used in food processing. Procedures shall be documented and implemented in regard to the following:

- Potable water is available for post harvest wash treatments
- Steam and ice shall be made from potable water
- All water used for cleaning food contact areas, or as a food ingredient shall be potable
- Potable water is available for hand washing
- Sufficient water quantity shall be available for the site's processing requirements.
- Where it is necessary for water to be stored (either to cope with peak demand or as a contingency) the water tanks shall be protected from contamination and monitored to demonstrate ongoing potability at point of use after the storage period. Water storage on site shall be regularly inspected and/or monitored
- Water should be available at the temperature required for the purpose A map of site water distribution and drainage should be used to assist in identifying risk areas e.g. 'dead legs' in pipe work and long pipe runs.
- Water sampling points shall represent the complete risk scenario on site.
- Water used for cleaning and as an ingredient shall be tested for contamination on a risk assessed schedule which demonstrates suitability for use. Water shall be tested at least annually.
- The quality of water, steam, ice, air, compressed air or gas which comes into contact with harvested product or packaging, shall be regularly monitored and shall be shown to present no risk to product safety, quality or legality

**\*8.7 TRANSPORT AND STORAGE**

- All equipment used for transportation / processing /storage of raw materials including packaging, work in progress and finished product to the customer, contract packer or further storage facilities, shall be suitable for the purpose, maintained in good repair and in a clean and hygienic condition
- "Food Container" grade or equivalent specification transport and shipping containers shall be used. If "Clean Container" or equivalent grade shipping container is used this shall be supported by risk assessment.
- Transport and storage equipment used by raw material suppliers shall be suitable for purpose and assessed as part of the documented raw material inspection protocols and supplier approval
- Refrigeration units for transporting and storage of produce shall be maintained in good repair and regular calibration of temperature gauges shall be undertaken and records maintained
- Refrigeration units shall be capable of maintaining product at maximum capacity at the required temperature or suitable validated contingencies shall be in place
- Where temperature control is required as part of the HACCP plan, suitable monitoring activities shall be in place. These may be automated or manual but shall be used at a suitable frequency with alerts in place to maintain product safety
- A procedure for securing of transport of finished produce shall also be developed and dispatch records maintained of the securing protocols
- Where raw materials and or produce is susceptible to cross contamination, procedures shall be in place to minimise the risk of cross contamination
- Where the material transported is susceptible to taint uptake from other foods or previously transported materials procedures shall be in place to prevent the risk of contamination.

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- Documented maintenance and hygiene procedures shall be in place for all modes of transport used to carry work in progress or finished product  
Where temperature controlled transport is used, documented procedures shall be in place to ensure product temperature requirements are met. Procedures shall be in place to ensure produce safety and quality in the case of vehicle or refrigeration equipment breakdown.
  - All incidents of vehicle or refrigeration equipment breakdown shall be recorded and corrective action documented, including the outcome of the raw materials and or produce on the load affected.
  - Where third party contractors are used to transport the raw materials or produce, all of the above requirements shall be addressed within a defined contract for the service provided. All third party contractors shall be approved within the approved supplier program
  - Traceability records shall be maintained throughout the storage and delivery process until receipt at Woolworths

**\*8.8 SITE SECURITY**

A scale site plan shall be available, showing the site boundaries and area. The plan shall be sufficiently detailed to show buildings, rooms and process flow.

The site perimeter shall be defined and should be securely fenced.

Access to all storage areas including transport trailers and shipping containers shall be restricted to authorised personnel.

Access to external storage areas including bulk silos, water tanks, chemical storage etc shall be restricted to authorised personnel.

External areas such as demountable units, portable cool rooms or freezers shall be fully secure.

Access to the site shall be restricted to employees and accompanied visitors or contractors. For sites which incorporate large expanses e.g. open fields the use of signage which directs visitors / contractors to a reception point is suitable. Directions and relevant procedures shall be available at the reception point to make the visitor / contractor aware of site requirements.

CCTV or other monitoring systems may be used if considered necessary or an improvement to security. The use of other photographic or recording technology shall be restricted to use authorised by a senior manager of the Vendor and be legally compliant.

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## **\*9. Equipment and Maintenance**

The requirements in this section shall be implemented to the extent possible by the nature of the Vendor's operation. Where the requirements are not practical to implement, the Vendor shall be able to demonstrate control of the quality and safety of the product.

### **\*9.1 EQUIPMENT DESIGN**

All equipment used to prepare, process, pack, cool or freeze product shall be:

- Suitable for the use in which it is employed.
- Designed and accessible to facilitate effective cleaning.
- Maintained and frequently assessed to ensure it is in good condition.
- Part of a planned preventative maintenance plan.
- Specified before purchase, commissioned after delivery and validated before commercial use (whether new or reconditioned).

### **\*9.2 EQUIPMENT FOR FOOD CONTACT USE**

- Equipment in direct contact with processed food products shall be constructed of stainless steel or other smooth, impervious and cleanable materials approved and appropriate for food use. Welds and joints shall be smooth and impervious and shall not allow debris to accumulate in crevices.
- Equipment should be designed to eliminate the trapping of liquids (including chemical solutions) during the cleaning process.
- New equipment should be supplied with information detailing its suitability for food processing.
- Where plastic items are used the plastics shall be suitable for food contact use. Plastics shall be marked as food contact suitable or documentation shall be available to demonstrate suitability.
- Parts susceptible to normal wear during use e.g. scrapers, conveyors etc. shall be inspected frequently and replaced before signs of wear become evident or a foreign object risk. Details of the equipment and the results of the inspection shall be recorded.
- Equipment in food processing areas shall be stored in a clean condition off the floor.

### **\*9.3 EQUIPMENT STORAGE**

- Equipment which is out of use or unsuitable for use shall be tagged or labelled as such.
- Equipment shall be stored in a clean condition and place where it is protected from contamination and pests.
- Equipment shall be cleaned and sanitised upon recommissioning.
- Food containers shall not be used to store equipment, parts or tools.

### **9.4 MAINTENANCE SCHEDULING**

- A log of all equipment shall be developed and maintained. Where multiple pieces of the same equipment are on site these shall be individually identified.
- A planned preventative (scheduled) maintenance program shall be implemented for all sites, incorporating food process plant, equipment, premises and surrounds.
- Maintenance shall be conducted by staff trained in the specific job or by contractors trained in the site's food safety procedures.
- New equipment shall be added to the planned maintenance schedule as recommended by the manufacturer.
- Where equipment breakdowns occur, the planned maintenance program shall be reviewed as part of corrective action. Changes shall be made to the program to prevent future breakdowns.
- The site planned maintenance schedule shall be reviewed and adjusted based on the equipment performance.
- The maintenance schedule shall include equipment condition inspection as well as physical maintenance requirements.

### **\*9.5 DURING MAINTENANCE**



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- Methods used shall ensure product safety or quality is not affected during maintenance tasks.
  - Contractors and in-house maintenance teams shall adhere to company hygiene, clothing and staff movement procedures. Maintenance contractors shall be supervised or their actions otherwise controlled.
  - The use of temporary screening structures shall be used during building works and/or where appropriate during equipment maintenance to prevent product contamination.
  - Temporary (tape) engineering repairs shall be minimized. These shall not affect product safety, quality or legality and the use of temporary fixes shall be promptly documented and rectified with permanent solutions as soon as possible and within a defined time.
  - Chemicals used in maintenance processes shall be identified, stored in a secure area and shall not present a risk to product.
  - Machinery lubricants shall be suitable for use on food equipment. In most cases this means they are to be approved for food use in the country of sale unless the lubricant or its application can be demonstrated as no risk to product. Used lubricant shall be disposed of as per local regulations.

**\*9.6 POST MAINTENANCE**

- An effective maintenance process shall be documented and implemented to ensure tools, equipment, and materials used or by-products of maintenance are identified and removed prior to re-commencement of production / processing. This shall include a physical count /reconciliation.
- Cleaning shall be carried out post-maintenance unless it can be demonstrated there is no risk to product.
- A suitable operations representative shall accept the clean and maintained equipment back from the engineering work and be satisfied it is fit for use in the production/processing of food. This process is irrespective of whether the maintenance is planned or emergency in nature and shall be documented.

**\*9.7 MAINTENANCE WORKSHOPS, STORES AND TOOLS**

- Maintenance workshops and engineering stores shall be controlled, clean and pest proofed.
- Maintenance staff and contractor's tools and tool boxes shall be clean and controlled to prevent contamination of processing environment and equipment.
- Tools shall not present a risk to product and shall be in good condition. Wooden tools should not be used. Tools shall be fit for purpose and modified for use where required.
- Tools for use in specific handling areas e.g. allergen specific areas, or alternative methods of control implemented.
- The use of tools shall be restricted to maintenance or other identified staff.
- Suitable protective clothing and hand washing facilities shall be provided for maintenance staff.
- Maintenance debris, waste and surplus parts shall be controlled to prevent risk to product; this may include the use of swarf mats on exit of maintenance areas.
- Maintenance storage areas and workshops shall be subject to documented GMP / housekeeping audits. The frequency shall be determined by product risk, size of operation and historical compliance.

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## **\*10. People**

The requirements in this section shall be implemented to the extent possible by the nature of the Vendor's operation. Where the requirements are not practical to implement, the Vendor shall be able to demonstrate control of the quality and safety of the product.

### **\*10.1 STAFF HYGIENE**

The staff hygiene rules shall be communicated to and implemented by all personnel on site. This includes management, visitors and contractors. The procedures shall be developed commensurate with the product risk in consideration with the following requirements:

- Rules for eating, drinking and smoking. Eating, drinking or smoking shall not be permitted during harvest. The only exception to this should be product sampling in designated controlled areas.
- Eating, drinking and smoking whilst wearing food handling protective clothing shall not be allowed.
- The provision of water fountains (bubblers) or drinking receptacles. Where these are provided (when required for employee health and safety e.g. in hot areas) they shall be controlled and shall present no risk to product.
- Protective clothing worn in processing facilities should not be worn outside. Protective clothing required for outdoor jobs should be specific to that use.
- The use of safety clothing e.g. High visibility jackets. These shall not be a risk to product and their use shall be controlled such that there is no contamination risk to product.
- Food handler's protective clothing shall not be worn in toilet areas.
- Spitting shall be prohibited.
- Rules for hand washing frequency, methods and use of sanitisers.
- Fingernails shall be short and clean. Nail polish and false nails shall not be permitted. Appropriate controls should be in place for short term visitors e.g. the use of gloves and non-handling of product or equipment.
- Where products such as barrier creams or hand creams are considered necessary these shall be provided by the Vendor in suitable locations and present no risk to product.
- Rules for acceptable wearing of jewellery; which shall be specified and shall include rules for plain wedding bands, body jewellery, religious jewellery and medical alert tags. Appropriate controls are required to be in place for wearing of permitted jewellery.
- Jewellery with stones or worn in or on exposed parts of the body such as tongue or eyebrow studs or rings should not be allowed.
- Wrist watches should not be permitted.
- The potential for tainting or product contamination through the excessive use of aftershave, perfume and cosmetics.
- Use of detectable plastic strips (adhesive dressings) to cover minor cuts or abrasions.
- Rules for the control of personal medicines.
- The introduction of allergens to the site through means other than raw materials e.g. through products sold / vended on site or staff lunches

### **\*10.2 MEDICAL SCREENING, ILLNESS AND INJURY**

The Vendor shall identify how it handles any employee, contractor or person visiting or working in a production area who is affected by a virus or a communicable disease. Where an employee has cuts, abrasions or other open wounds, the Vendor shall document a procedure to ensure the employee does not expose the product to any risk. Specific reference shall be made to regulations in country of production and / or sale.

The Vendor shall implement procedures detailing the action to be taken where illness or injury results in a contamination incident. The incident shall be documented.

A return to work policy shall be documented and implemented for staff returning to work after illness.

**\*10.3 PROTECTIVE CLOTHING**

Protective clothing shall be supplied for staff, managers, visitors and contractors. The policy shall be developed, documented and implemented commensurate with the product risk and shall consider the following aspects:

- The protection of the product (as well as the person wearing the clothing) in the selection of appropriate protective clothing.
- Rules for wearing clothing, footwear, hair coverings, beard snoods, and protective head gear where applicable.
- Rules for wearing religious or cultural clothing including headgear.
- Rules for the use of safety personal protective equipment such as hearing protection and high visibility clothing.
- The number of garments required on site to ensure a sufficient supply of clean clothing whenever required including when a department or site wide change is required e.g. in the case of a contamination issue or evacuation.
- Minimum frequency for changing clothing. Procedures for the changing of soiled clothing during processing shall be implemented. This shall include maintenance staff where clothing has become soiled due to a maintenance activity.
- The use of safer fasteners for coats e.g. enclosed press stud, not sewn buttons.
- The use of pockets in protective clothing.
- The use of disposable protective clothing. Where these items are used, a policy shall be developed to ensure the items are changed and disposed of frequently or when contaminated, and to indicate in which areas the items shall be used. A procedure shall be in place describing the actions to be taken if an item is found to be damaged. Disposable protective clothing should be visibly contrast coloured to aid in its detection.
- Rules for the use of gloves including areas and/or jobs for which these are required to be worn.
- If personal protective equipment such as hearing protection or hard hats are worn these shall be clean.
- Personal protective equipment shall be controlled and shall not present a product contamination risk. Where hearing protection is required, these items shall be controlled or detectable.
- Clean suitable footwear shall be suitable to the job. Washable footwear and suitable cleaning facilities should be provided where deemed necessary. Where mechanical boot wash units and footbaths are used these should be located appropriately, cleaned and monitored regularly to verify they are not a source of cross contamination. Where footwear cleaning stations are dosed with chemical (automatically or manually) the concentration shall be regularly monitored. Footwear cleaning facilities shall be used by all personnel at the required frequency.

**\*10.4 LAUNDRY**

- Methods of segregating clean protective clothing from used or soiled clothing shall be used. Clean clothing shall be protected from contamination.
- Where protective clothing is laundered on site this shall be in a segregated space and the equipment used shall be suitable for the volume of clothing used.
- If a contract laundry facility is used this shall be subject to supplier approval and monitoring.

**\*10.5 PEOPLE MOVEMENT**

Any potential risks due to people movement around the site shall be identified with a procedure implemented for control of staff movement. This shall include:

- A procedure for documenting and managing personnel movement in and out of the processing facility based on risk and hazards appropriate to the operation. Access to the processing site should be restricted to authorised persons. The permitted people movement traffic routes should be defined on a drawing of the processing facility. The plan should also show emergency routes e.g. fire exits.

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- Procedures for the re-entry to processing facility areas after an evacuation exit e.g. a fire drill should be documented. These procedures should involve a change of protective clothing where appropriate.
  - Procedures for the protection of product and packaging left in processing facility and/ or on the line at the time of evacuation shall be documented and implemented

**\*10.6 CONTROL OF VISITORS AND CONTRACTORS**

Access to the processing facilities by Visitors and Contractors shall be documented with records of entry and arrival and departure times.

Visitors and Contractors shall be identified and be supervised. Alternative methods may be employed where practicable e.g. for long term contractors.

Visitors and Contractors shall be made aware of relevant company policies including staff hygiene, movement, clothing and medical rules before access is granted to production or storage facilities. This communication shall be documented.

The Vendor shall document and implement a procedure for control of visitor and contractor movement. Access to the premises by contractors shall be limited to those areas required. Where Contractors require access to specific areas e.g. roof spaces this access shall be controlled to prevent risk to product.

**\*10.7 TRAINING**

The Vendor shall ensure all staff are trained and supervised in the activities which they carry out.

A management representative shall be responsible for co-coordinating the training needs of the site. Training shall meet or exceed legislative requirements where relevant.

The Vendor shall demonstrate understanding of relevant legislative aspects. If necessary, a source of expert advice shall be available.

All new staff, permanent, casual or agency; visitors and contractors shall be trained in food hygiene and site specific procedures including entry procedures, glass breakage, allergen controls, illness and accident reporting as a minimum. All staff shall be re-trained in these procedures when any changes are made.

Activities which directly affect product safety, quality or legality shall be identified. Staff performing these tasks shall have job specific training or shall otherwise demonstrate competency. This includes permanent and temporary staff. All staff shall be supervised according to the risk nature of the task carried out.

The Vendor shall define the job specific skills required for the site. The Vendor shall develop a training matrix showing staff competency in site skills. The information gathered from the training matrix shall be reviewed and used to develop a training plan to ensure the site's ongoing needs are met. The matrix shall be kept up to date and reviewed minimum annually. Refresher training shall be carried out for all staff at a suitable frequency irrelevant of length of service or experience.

Records of training of all employees in the relevant procedures to their duties shall be documented and maintained. Training shall be delivered in a language and style appropriate to the Vendor's business such that it is effective i.e. the literacy needs of the people are known and accounted for e.g. with translated documents or verbal sessions. Training can be on or off the job as appropriate to the skill but shall be fully documented.

The documentation shall include:

- Name of the trainer or training provider and qualification / experience
- Date of the training session
- Duration of the training session
- Name of the employee being trained
- Description of the skill being trained
- If the training is a new skill or refresher training
- Acknowledgement (signature) of completion of training by person being trained

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- Identification if further training is required
  - Signature of the trainer

The effectiveness of all forms of training shall be evaluated. This evaluation shall be documented and shall include a form of assessment and/or demonstration of competence. Retraining shall be scheduled if required.

Where training is outsourced the Vendor shall maintain details of the course / session content.

Where an employee moves into a new role the training needs of the employee relevant to the new role shall be evaluated and provided as required.

The Vendor shall have at least one representative formally trained in HACCP. This training shall be updated at least every three years. This representative shall be able to demonstrate competency in the principles and application of HACCP.

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## **\*11. Prevention of Foreign Object Contamination**

### **\*11.1 GENERAL REQUIREMENTS**

All products shall be free of extrinsic foreign objects such as plastic, glass, metal, dirt, or grease, including contamination from the process or packaging. Unless allowed by the specification, all products are to be free of intrinsic foreign objects such as, feather, pips or stones.

Policies and procedures for prevention of foreign object contamination of finished product shall be implemented irrespective of the use of foreign object detection systems.

All steps shall be taken to identify, avoid, eliminate and control the risks of foreign object contamination. The assessment of risk shall be documented in the hazard analysis, and HACCP principles shall be used to determine critical control points for foreign objects to evaluate the need for detection and removal equipment.

The process shall be designed to prevent foreign object contamination of the finished product. Examples may include enclosing the product, rinsing or washing the product

The site shall develop a register of necessary items permitted to be used in specified processing areas, and controls shall be implemented to manage compliance to the list, including compliance by visitors and contractors. Detectable versions of equipment required in processing areas shall be sourced where available and practical. Examples are detectable one piece pens, stainless steel clipboards and scrapers.

Equipment used in the process shall be suitable for use, durable, and used in the way originally designed. Unauthorised modified equipment can present a foreign object risk and shall not be permitted.

There shall be a system in place for all staff to report a foreign object finding or potential for foreign object contamination. All reported incidences shall be documented and resolved as appropriate such that product is protected from the contamination risk.

A system of challenging the potential for foreign object contamination of product shall be implemented (foreign object audits). The foreign object audits shall incorporate a 'bag audit'. The frequency of this assessment shall be based on risk i.e. nature of product / process, type and history of contaminants found, levels of complaint etc. The results of the assessment shall be documented and subject to management review. Where a risk is identified, the product shall be protected.

Start-up checks shall be carried out of the processing line and the immediate environment on each occasion before processing commences. The area shall be checked for immediate product contamination risks and may include for example: Condition of glass like materials, line cleanliness, machinery present and functioning, required equipment available, required people dressed as per site policy for the product about to be produced. The start-up check is to be documented and signed by the manager responsible for the area.

### **\*11.2 GLASS, CERAMICS AND HARD BRITTLE PLASTICS (GLASS LIKE MATERIALS)**

The use of the above materials shall be excluded from open product areas on site and alternatives used where possible and available. Where alternatives cannot be found, these items shall be minimized and protected from damage.

A site risk assessment shall be completed for the prevention of contamination of product with the above materials. This shall be based on risk to product. Controls shall be developed, documented and implemented to address the risks identified. These shall include the following:

- Policies for exclusion of risk materials.
- Procedures for maintenance and cleaning of risk materials to prevent accidental breakage e.g. changing of a glass light fitting (globe) or cleaning light fittings.
- A register of all risk items on site and how they are controlled shall be developed and maintained.

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- The register shall show the location, number of items, type of item and its condition.
  - The condition of all items on the register shall be regularly assessed on a frequency derived from the site risk assessment.
  - The use of sealed breakage kits. Breakage kits shall contain all items readily required in the event of a breakage such as: Copies of the breakage procedures, cleaning equipment suitable for use, and sign off documentation.

Procedures shall be in place detailing action to be taken when accidental breakage of the above materials occurs. These procedures shall include:

- Suitable cleaning methods.
- Quarantine of affected product and area.
- Disposal of all equipment used in the clean-up of a breakage.
- Details of which equipment to use, how and where to dispose of debris.
- How to deal with clothing and footwear of all staff involved with an accidental breakage. Clothing should be changed and footwear inspected as a minimum requirement.
- A documented inspection of the area as fit for production to re-commence by an identified trained staff member.
- Safe retention of a sample of the broken material for future reference.
- Where the incident is recorded e.g. on a specific incident reporting form.

**\*11.3 USE OF HIGH RISK PACKAGING MATERIALS**

Where product packaging materials pose a safety risk, special handling procedures shall be in place to prevent product contamination.

The Vendor shall be able to demonstrate how specific control of these materials has been achieved to present no risk to product safety.

**\*11.4 SOFT (FLEXIBLE) PLASTICS**

Where soft plastics are used for disposable protective clothing, in production, or for packaging or raw materials these shall be risk assessed for potential plastic contamination of the finished product. Plastics should be contrast coloured, and of sufficient gauge (thickness) that the risk of tearing is reduced dependent on type of use.

The site should work with its raw material suppliers to ensure raw materials are delivered in the most appropriate packaging for use.

Where packaging materials pose a product safety risk, special handling procedures shall be in place to prevent product contamination or spoilage. Records shall be maintained of packaging failures and appropriate corrective actions.

A plastic sack opening and resealing or decanting procedure shall be developed, documented and implemented to prevent the contamination of product with packaging materials during opening.

Plastics which are required to be cut as part of the process shall always be cleanly cut and never torn.

Where frozen raw materials are wrapped in plastic the frozen goods shall be tempered or defrosted for the whole and complete removal of the plastic before use in a product or process.

**\*11.5 HARD (BRITTLE) PLASTICS**

Where plastics are used as food contact materials, information shall be obtained to demonstrate the plastics are suitable for the use in which they are employed.

The use of brittle plastics shall be avoided in production facility, but if their use is unavoidable controls equal to those implemented for glass-like materials shall be developed and implemented. (Exception: Product crates.) Where plastic crates are used for storage or distribution of raw materials, work in progress or finished product, the Vendor shall demonstrate crate condition and use controls are implemented to prevent contamination risk of product.

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**\*11.6 WOOD, CARDBOARD AND PAPER CONTROL**

Wood shall not be used in open product handling areas except where it is a requirement of the process and no suitable alternatives are available e.g. wooden pallets. Where this is the case, procedures shall be developed and implemented for the specific control of this hazard.

Policies for the exclusion of wood into open food handling or processing facilities shall be documented and implemented.

Where the use of wooden items is unavoidable and suitable alternatives are not available, it shall be demonstrated all other options have been considered, and subsequent control measures shall be documented and implemented.

All wood items in open product facilities shall be free from damage and splinters.

Cardboard should be minimised on site and not used in open product handling areas unless unavoidable e.g. cores for sealing film.

Where raw materials and finished product are packaged into cardboard, safe knives shall be provided for opening product such that cardboard is not torn.

A paper sack opening and resealing or decanting procedure shall be developed, documented and implemented to prevent the contamination of product with packaging materials during opening.

Paper labels shall be controlled. Paper hole punchers shall not be allowed in production facilities.

Tags used in production facilities shall be controlled and detectable where possible.

Wooden pallets and pallet debris shall be controlled to prevent contamination risk of product. Where wooden pallets are utilised, product should be protected from contamination by wood or wood splinters e.g. by use of a slip sheet or other physical barrier. .

**\*11.7 METAL CONTROL**

A policy shall document and describe the procedures implemented for the control of metal objects used in production e.g. knives, cutting blades, stirring implements. A record of inspection for damage of these items shall be completed and documented before use of the equipment. A breakage procedure shall be in place for equipment of risk e.g. which is in direct contact with the product. Safe storage for this equipment shall be available and used for equipment not in use. There shall be a procedure documented and implemented for the disposal of used knives.

Procedures for sharpening knives and blades shall be documented and implemented. Knife grinding shall not be carried out in production areas. Knife steeling (i.e. to maintain sharpness) may be carried out in production areas but shall be controlled and present no risk to product.

Metal office staples, drawing pins or similar shall not be used in production areas. Raw materials should be purchased in packaging free from staple closures.

**\*11.8 FOREIGN OBJECT DETECTION SYSTEMS**

Foreign object detection equipment (e.g. metal detectors, x-ray) shall be situated to minimise the risk of foreign object contamination within the finished product. In most cases this will be in line, screening finished packed product. However, detection systems (including optical sorters) may also be used on part processed products where this improves the protection of the finished product from contamination.

**All Woolworths branded prepack produce<sup>#</sup> should be subject to metal detection as a minimum standard.**

**# for the above criteria only pre-packed produce includes all products in an enclosed sealed package, and excludes all net packaging, open sleeves, tagged product and product intended for loose sale.**

Where detection equipment is not used, this shall be supported by a documented risk assessment. The risk assessment shall support the Vendor's decision of not utilising detection systems for the product concerned and in their specific circumstances. It shall indicate alternative methods employed which are equally effective as detection equipment with respect to overall incidence level of foreign object contamination. This risk assessment shall be subject to management review to ensure it remains appropriate.



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Where filters, magnets or sieves are used in the process, these shall be regularly inspected at a frequency based on risk assessment. The location and mesh size/magnet strength or other capability measure shall be defined.

Where detection or removal systems are used e.g. metal detectors or X ray, the company shall apply Industry best practice and establish critical limits for detection based on the type of product and its packaging as well as the position of the detector in the process. The detection system shall operate at the maximum workable sensitivity and validation records shall be available to demonstrate how this sensitivity was established.

The metal or foreign body detector should incorporate the following features:

- An automatic rejection device or an alarmed belt-stop system. Belt stop systems shall be used where automatic rejection devices are not appropriate i.e. cause product damage.
- The belt stop shall only be able to be re-started by authorised personnel
- The automatic rejection device should reject product into a locked container accessible only to authorised personnel
- Pipeline detectors (e.g. pipeline detectors for fluids) shall identify the location of the contaminant and divert affected product to a segregated part of the process. The affected product may only be accessed by authorised personnel

Testing and calibration of the equipment shall be carried out at a regular nominated frequency. Trained personnel shall carry out the system operation checks. These checks shall be documented. The frequency of the verification checks shall be established taking account of the Vendor's ability to recover affected material before release in the event of equipment failure. The test shall replicate the product being screened at the time and the worst case scenario of contamination.

The equipment shall be included on the planned preventative maintenance schedule with service and calibration records documented.

Procedures shall be documented which specify corrective action in the event of a detection of a foreign object or machine failure. All staff with operational access to the machinery shall be trained in these procedures.

The procedures shall include identification and isolation/quarantine of all product produced since the last acceptable test of the metal/ foreign body detector. The procedures shall also detail the required corrective actions which shall be implemented before quarantined product is released to Woolworths.

#### **\*11.9 FOREIGN OBJECT FINDINGS**

All foreign object findings shall be investigated with the results of the investigation, root cause and corrective actions documented. This includes reported items, findings through detection systems and foreign object audits. Foreign object findings shall be documented and trended to establish any common sources. All investigations shall involve liaison with raw material suppliers where appropriate.

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**\*12. Management of Allergens**

All allergens as defined by legislation in the country of sale shall be included in scope by the Vendor. Vendors shall ensure the allergens in scope are defined and shall be aware different countries have different definitions of allergens.

All employees shall be trained in food allergens and the relevant site procedures for allergen management.

**\*12.1 ALLERGEN MANAGEMENT PLAN**

An Allergen Management Plan shall be developed, documented and implemented. This shall include the following as a minimum:

An assessment of all materials on site for their allergen content either directly or by cross contact shall be carried out and documented. This information shall be obtained from the supplier of the material such that the ingredients of the raw material as well as the processing conditions are taken into account. The Vendor shall have a system for staying informed of changes to the allergen status of materials purchased.

Items brought into the processing facility shall include the introduction of allergens through items brought in as staff food / lunches.

Materials used as processing aids or during maintenance (or any material which may come into contact with the product) shall also be considered.

All allergens handled on site either directly or through cross contact shall be documented.

Allergens shall be minimised as much as possible by sourcing non allergen containing alternatives where available, and developing products where the use of allergens is minimised as far as practicable.

All allergen containing raw materials, work in progress, waste, finished product and/or rework shall be identified and stored in allocated spaces to reduce the risk of contamination. Items containing an allergen should not be stored above allergen-free materials. Items containing multiple allergens shall not be stored above items containing fewer or different allergens. Product flows for allergens should be implemented to reduce risk of contamination. The use of rework shall be defined and controlled so it is not a source of contamination. The physical form of the allergen (e.g. solid particulate) being handled shall be considered as part of the risk assessment.

Where allergens are on site the process flow of allergen containing ingredients, raw materials, work in progress and finished products shall be documented on a plan of the site in order to establish potential routes of contamination of non-allergen containing materials. The schematic shall demonstrate process flows to keep non-allergen containing items safe from allergens by minimising and controlling cross contact points.

Where multiple allergens are handled production shall be scheduled to reduce the risk of cross contamination. Physical or time segregation shall be implemented and supported with effective cleaning regimes. The number and type of allergens handled shall be reflected in the risk assessments. The identification and handling procedures of allergens in the processing facility shall be clearly defined and implemented.

Cleaning methodologies shall be validated as effective at removing allergenic material and preventing cross contamination.

Use of protective clothing, production equipment, cleaning equipment and processing aids shall be considered as a risk for allergen cross contamination. Controls shall be implemented and validated to reduce the risks identified.

Procedures shall be in place for product development trials if these involve products or materials containing allergens.

Procedures shall be in place detailing actions to be taken in the event of an allergen spill or a contamination incident.

#### **12.2 VITAL (Voluntary Incidental Trace Allergen Labelling)**

Woolworths encourages the use of the tool for all products but is not a compulsory requirement for produce.

#### **12.3 ALLERGEN LABELLING**

All products containing allergens shall be labeled in accordance with legislation in the country of sale. Woolworths does not support generic allergen cross contact statements to account for apparent limited processing controls. Woolworths Brands Vendors shall obtain prior written approval from the Woolworths Quality Assurance Team in relation to additional declaration of allergens through cross contamination.

#### **\*12.4 'FREE FROM' STYLE PRODUCTS**

Products specifically labelled as 'free from' or 'produced without' (or similar) an ingredient known to cause allergy, sensitivity or intolerances in the population require specific validated procedures to support the on pack claim. The verification of these procedures shall account for the specific risk of this category. This shall include a testing plan incorporating raw materials, work in progress, finished product and environment as relevant.

Finished products in this category shall be subject to a full chemical screen (for all test methodologies currently available) to support the accuracy of the on pack allergen statement.

#### **12.5 SUPPORTING DOCUMENTATION**

- Documented evidence shall be kept to support allergen claims
- The procedures of the allergen management plan shall be fully validated and included on the internal audit program.
- Allergen testing quantitative analysis shall be used to confirm assumptions and validation studies and verification where applicable.
- All claims shall be fully validated.
- All procedures and documentation shall be reviewed when any process, product, ingredient or input changes or when new products are developed or launched.

*Please refer to "Manage Allergens".*

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## \*13. Management of Cleaning

Procedures shall be developed, documented and implemented for the cleaning and disinfection of the production facility, fixtures and equipment. The implementation of the procedures shall result in clean equipment and a clean facility regardless if the cleaning is carried out by contract cleaners or employed staff.

The objectives for cleaning shall be:

- The removal of physical contamination and debris from the facility, fixtures and equipment.
- Removal of allergens

A nominated member of the Management Team shall be responsible for managing the cleaning program.

The requirements in this section shall be implemented to the extent possible by the nature of the Vendor's operation. Where the requirements are not practical to implement, the Vendor shall be able to demonstrate control of the quality and safety of the product.

### \*13.1 CLEANING PROCEDURES (WORK INSTRUCTIONS)

Cleaning work instructions shall be developed for the site, documented and implemented.

These shall include all production and storage areas, fixtures and fittings, all equipment used for food production /processing, all cleaning equipment, amenity areas and transport facilities.

The procedures should include as a minimum:

- The name and a specific reference code of the equipment or area (for document reference purposes)
- The location of the equipment
- The frequency of cleaning
- Who is responsible for the cleaning
- Number of cleaners and approximate time required and acceptable alternatives e.g. at times of peak season
- When the item / area is to be cleaned
- Cleaning equipment required
- Chemicals required, the concentrations used and contact times
- Requirements for the use of hot water
- Methodology for the cleaning
- Equipment required for safety during the cleaning process e.g. working at heights
- Reference to safety procedures to be followed during the cleaning process
- Reference to records of cleaning completion
- Key inspection points for cleaning verification
- Consideration of sequence of cleaning to avoid recontamination of clean equipment

Details shall be given for equipment strip down and accessibility requirements for effective cleaning. Reference shall be made to maintenance support if this is required for an effective equipment strip down for cleaning and rebuild for production. Photos should be used in the documentation as visual aids.

The cleaning procedures shall detail methods for the drying and removal of excess water or cleaning solutions from clean equipment and surfaces before production if wet equipment / surfaces may give potential for product contamination.

The documentation shall also include procedures for in-between batch cleaning (if this is different to the standard clean).

Raw materials, work in progress and completed product shall be protected from contamination at all times during cleaning processes.

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Methodology shall also be documented and implemented for periodical cleaning (where there is a different level / type of cleaning carried out at a different frequency to the standard clean).

The frequency of cleaning should be based on experience, validation and verification data and the equipment manufacturers' recommendations.

Appropriate cleaning procedures shall also be implemented after building work and maintenance activities. This includes the introduction of new equipment or equipment modifications. The cleaning procedures shall be updated when new equipment is introduced or when equipment is modified.

A summary document of the cleaning procedures shall be available. i.e. a cleaning matrix. This shall list all items and areas to be cleaned and shall identify the different clean types (e.g. in-between product / allergen / shift / daily / deep / detailed) and frequencies (e.g. daily, weekly, monthly) for each item.

**\*13.2 CLEANING EQUIPMENT AND FACILITIES**

Pressurised air lines shall not be used in the cleaning process.

High pressure water hoses should not be used in the cleaning process. High pressure water shall only be permitted when the benefits of use outweigh the risk of equipment and environmental contamination, and it can be demonstrated the clean is effective. Areas where high pressure water is permitted shall be documented.

Water hosing to clean processing facility shall not be carried out at the same time as processing.

Tray and crate washing equipment should operate a dirty to clean flow. Where equipment washing sinks are used, these shall operate with a dirty to clean flow with a multi (2 or 3) sink operation.

Utensils and equipment which are "wet cleaned" shall be air dried to prevent cross contamination, Equipment for a processing facility shall be stored dry or in a disinfectant solution if appropriate.

All cleaning equipment shall be identified and captive to the risk area where it is used

Separate equipment shall be used for cleaning food contact and non-food contact surfaces.

Steel wool (including cleaning pads) or wire brushes shall not be permitted. Where coloured scouring pads are used to assist with manual cleaning, procedures shall be in place to prevent product contamination.

Cleaning equipment such as brushes or water hoses shall be replaced on signs of wear or damage.

Porous items including sponges, cloths and wooden handled equipment should not be used in a processing facility.

Facilities shall be provided for the storage of clean cleaning equipment whilst not in use. E.g. squeegies should be stored head down, off the floor and hoses should be stored off the floor.

Water shall be removed from floors and flat surfaces after wet cleaning in areas where this may result in product contamination.

Mops should not be used in production or storage areas unless the mop head is renewed after each use occasion.

Squeegies should be of single blade construction.

**\*13.3 CLEANING CHEMICALS**

All cleaning chemicals used shall be selected based on suitability for use and best efficacy for the specific process. All cleaning chemicals used shall be approved for use within a food processing facility. Expert advice shall be sought if needed. There shall be a list of approved cleaning chemicals permitted on site, the suppliers and the locations where they are to be used.

Dilution rates and storage conditions shall be specified for each cleaning chemical used.

All cleaning chemicals shall be clearly identified, controlled and stored away from processing areas. Access to chemical storage areas shall be restricted and the store, bulk supply or pallets should be bunded or otherwise contain any spills.

Records of chemical usage and traceability shall be maintained, including type of chemical, application rate and location used.

The concentration of all chemicals at point of use shall be monitored at a frequency based on risk. Records shall be maintained of all concentration checks and corrective actions (if required) shall be documented.

Pine or phenolic based chemicals shall not be used as these have potential to taint products.

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All hand spray bottles shall be labelled with chemical and concentration. The use of spray bottles shall be documented in the cleaning procedures.

Disinfectant chemicals shall be applied for the minimum contact time for efficacy as stated in the specification. Disinfectants shall be rotated periodically if this is part of the validation requirements. Records shall be maintained.

**\*13.4 TRAINING AND SUPERVISION OF CLEANERS**

Cleaning staff shall be trained against individual cleaning procedures and the application and use of chemicals and equipment in line with the Training section of this standard.

Cleaners shall be supervised before, during and after the cleaning process. Should any issues be identified in respect of cleaning completion, these shall be documented and resolved through the Corrective Action procedures.

**\*13.5 VALIDATION AND VERIFICATION OF CLEANING**

The Vendor shall demonstrate the cleaning procedures implemented achieve the cleaning objectives.

Cleaning staff shall sign off completion against each individual cleaning work instruction each time cleaning is completed. A management representative shall confirm the clean has been completed to the required standard and sign off the record accordingly.

Records shall be maintained of periodical cleaning, showing the area / equipment to be cleaned, the target date of cleaning and the actual date the clean was completed.

An independent visual and physical inspection of the finished cleaning standard shall be carried out. This shall be a sample of the equipment and environment on a rotational, risk assessed basis by a competent member of staff at each cleaning occasion. These inspections shall be scheduled.

The inspection and any corrective actions shall be documented. Any issues shall be communicated back to the individual(s) responsible for the cleaning task to aid in continuous improvement.

Pre-operational hygiene inspections shall be conducted by suitably qualified staff prior to processing recommencing. These visual inspections shall incorporate visual checking and pest inspections. The responsibility for completing any corrective action required shall be defined. Any issues identified shall be resolved and verified before the equipment / area is used for processing.

**\*13.6 SWABBING**

Where applicable, traditional microbiological and allergen swabs should be used as part of the validation of cleaning methods and verification of effectiveness.

Swabbing in low risk areas or low risk facilities shall be completed as defined by risk assessment and historical data.

A suitable neutraliser for sanitiser shall be used on each swab.

Corrective action shall be applied and documented for any out of specification result and followed up by a re-test.

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## **\*14. Pest Prevention**

### **\*14.1 SCOPE**

The Vendor shall develop, document and implement a pest prevention and control program for the whole site including the perimeter and storage areas. The program shall include insects, rodents, birds, stored product insects (SPI) and all other relevant pests for the geographical area and location of the site. The focus shall be on preventing the initial ingress of pests and on effective and prompt control should any issue arise which may present a risk to product.

The pest prevention provider shall meet legal requirements and be licensed where required. Evidence of training and credentials are required for each service person to demonstrate suitability for the job. Access to specialist help shall be available when required. If a contractor is used, an employed member of staff and deputy shall be responsible for the management of the contractor and the overall pest prevention program. The contractor should be accompanied in service inspections by the site representative. Access shall be available to all areas for the purpose of pest prevention and control.

Woolworths shall be informed if a pest activity or infestation places the produce at risk.

The requirements in this section shall be implemented to the extent possible by the nature of the Vendor's operation. Where the requirements are not practical to implement, the Vendor shall be able to demonstrate control of the quality and safety of the product.

### **\*14.2 PEST PROOFING**

The site and buildings shall be effectively pest proofed to prevent the ingress of pests into internal areas. Specialist advice regarding proofing shall be obtained if required. Methods may include:

- Closed tight fitting doors (self close if required)
- Brush strips around door frames and openings
- Screens on external windows or openings
- Bird netting, spikes and scarers

### **\*14.3 MONITORING STATIONS AND PEST CONTROL PRODUCTS**

Monitoring stations such as rodent baits (internal and external), pheromone (moth) traps, electric fly killers (EFK) / Flying insect control units (FICU) or cockroach traps shall be strategically placed around the site in order to effectively monitor and control pest activity. Locations shall include where relevant: Site perimeter, roof spaces, dry goods stores, maintenance stores / workshops, staff facilities and ancillary areas.

Pest prevention and control measures shall be undertaken in areas surrounding the processing facility to reduce the necessity of these products in exposed product handling or storage areas.

Toxic rodent baits should not be used in processing facilities / storage areas or areas where food could become contaminated. All bait or monitoring stations in processing facilities shall be secured to wall/floor/fixed structure to prevent removal. Rodent baits shall be robust (metal or plastic) and locked or otherwise tamper proof. Loose grain bait shall not be used in any processing or storage area.

Chemical records shall be maintained as per legal and WQA Ground, Water and Crop requirements. Where pest prevention and control products are required to be stored on site, this shall be in a locked area with secure access by authorized staff.

A schedule of application for chemicals shall be documented.

EFK / FICU, where used, should be positioned by risk assessment and historical data obtained. The locations shall not present a risk to product. EFK / FICU should not be placed in exposed product areas. If this is considered necessary, extra measures shall be taken to protect the product. All globes used in EFK

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/ FICU shall be shatterproof. EFK / FICU globes and sticky pads shall be replaced whenever required but minimum annually before the flying insect high season.

**\*14.4 BAIT MAPS**

A full detailed plan of the site shall be provided. This map shall show the locations, position and type of all EFK, baits and monitoring stations. Each physical bait or monitoring station shall be numbered or otherwise identified to enable it to be referenced to the map.

The overall map shall be dated, with dates of amendment recorded. The map shall be updated whenever there is a change.

**\*14.5 REPORTING PROCEDURE**

There shall be a method of reporting pest sightings by any employee such that action is taken.

**\*14.6 SERVICE RECORDS**

All monitoring stations should be inspected on a regular pre-determined schedule throughout the year.

The inspections shall be scheduled to account for times of day and year when activity from pests at risk is most likely, and account for seasonal production. All missing monitoring stations shall be investigated.

Each monitoring station shall be opened for inspection, cleaned and dated and records kept to demonstrate the inspection has taken place. This schedule shall be documented and levels and types of activity found shall be documented.

A record shall be maintained of inspections, activity and action reports. Where chemicals are used these shall be identified including name of chemical, quantity, dilution rate, batch no. / traceability, location where used and person applying chemical.

Proofing requirements and improvements shall be documented along with hygiene and housekeeping recommendations.

**\*14.7 CORRECTIVE ACTION**

All corrective action requirements (including proofing requirements, hygiene and housekeeping issues and evidence of pest activity) shall be acknowledged, completed as required and signed off on completion by a trained, accountable representative of the Vendor. If evidence of infestation is found by a pest prevention inspector or technician, this shall be documented and communicated to the nominated representative of the Vendor. All potentially affected / contaminated products shall be treated as non-conforming.

Corrective action procedures and the follow up schedule requirements shall be documented. This shall include definition of responsibility where a contractor is used, and shall include as a minimum responsibility for clearing rodent droppings and cleaning and servicing EFK/ FICU.

**Re-visit inspections shall be carried out on a regular defined basis until the infestation or activity is cleared.**



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## \*15. Validation and Verification

All processes in place shall be validated. Validation shall involve the gathering of evidence to support the process is capable of achieving its desired outcome.

Verification activities shall be implemented to demonstrate all aspects of the quality food safety and legality management system are effectively operating.

### \*15.1 PRODUCT ASSESSMENT

Procedures shall be implemented to ensure all produce and ingredients supplied to Woolworths are compliant with the agreed specification criteria from a safety, legality and quality perspective. This includes sensory attributes to the end of the product's shelf life. Documented records of all assessments shall be maintained.

Product assessment shall include the label of the product for compliance to mandatory regulatory requirements and product claims. Information and claims on label are to be verified and supported with documentary and testing evidence.

### 15.2 PRODUCT TESTING

All Vendors shall ensure they have a chemical, physical and microbiological testing program in line with the product specification and known product issues. All products shall meet the microbiological, pesticide residues, heavy metals, food additives, chemical and contaminants criteria prescribed for the product in the country of production and sale (or as per Woolworths requirements) through to the end of shelf life. It is the responsibility of the Vendor to determine the frequency of testing through documented risk assessment; a minimum annual testing regime is required. This risk assessment shall include consideration of the following:

- Nature of product (including inputs, storage requirements etc)
- Intended use of the product (ready to eat etc.)
- Historical results obtained
- Raw material issues
- Amount of handling through the process
- Facility restrictions
- Volume
- Frequency of production
- Climatic conditions

### Food Safety Outcomes

For all Woolworths Branded products, microbiological, physical and chemical criteria shall be tested on a 6 monthly basis as a minimum in accordance with the product specification criteria based on hazards identified (MRL testing to be conducted at least annually).

### Finished Product

All Woolworths Branded products shall be verified for all specification and legality aspects on a minimum annual basis.

Product managed by a market wholesaler / packer / brokerage or like arrangement shall verify effective chemical, physical and microbiological compliance through information gathered from their suppliers provided the market wholesaler / packer / brokerage also has a percentage of product checked, at random, based on risk and volume.

Microbiological and chemical (MRL and approved chemical usage) testing shall be undertaken where potential hazards are identified in the process or where current information (such as overseas or trade literature), indicates potential hazards may exist. Where potential microbiological and chemical hazards are identified testing shall be carried out at least annually on each grower's product (or product type if the process is the same), as part of the verification activity to show those hazards are in control. Where potential hazards have been identified in the process inputs, it may also be appropriate to conduct random testing on these inputs (e.g. water etc).

**15.3 FOOD SAFETY CRITERIA**

**MICROBIOLOGICAL CRITERIA**

Vendors shall have a microbiological testing program in place, where applicable. This shall cover all products and meet the minimum criteria listed in Appendix 2.

Where a Woolworths specification has been developed for a product the microbiological criteria specified in the specification is also to be adhered to throughout the product’s shelf life.

Where product is known to support the growth of other organisms they shall also be tested as part of the verification program to demonstrate product safety and quality throughout shelf life.

*See Appendix 2 for Microbiological Criteria by Product Category*

**For All Produce:** Where a positive pathogen (*Listeria* (all species), *Salmonella*, *E.coli*,) is detected above the levels as per Appendix 2 in any product intended for Woolworths supply, this shall be immediately reported to Woolworths QA Department.

**CHEMICAL CRITERIA**

<b>CHEMICAL CONTENT &amp; CONTAMINANT RESIDUES</b>	<i>All chemicals used shall be registered and approved for use for the product in accordance with the regulatory requirements of the country of production and sale (or Woolworths requirements). Examples include MRL limits.</i>
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Vendors shall have a chemical testing program in place for all products which is inclusive of the requirements relevant to the product chemical criteria listed in Appendix 2. Where a Woolworths specification has been developed for a product the chemical criteria specified in the specification is also to be adhered to throughout a realistic shelf life.

*See Appendix 2 for Chemical Criteria by Category*

**15.4 RETENTION SAMPLES**

Where retention samples are retained it shall be for the entirety of the shelf life of the product (plus an additional time period proportioned to the shelf life of the product) under the recommended storage conditions. For example 10 day product should be kept for 12 days. A risk assessment shall be undertaken based on product safety, risk and volume of product supplied to determine the number of product samples retained. This determination of the number of product samples is to be retained over the nominated shelf life and shall be documented within the retention sample procedure. This shall be reviewed at least annually or when a change in safety, risk or significant volume occurs.

A procedure shall be implemented to ensure product samples are retained for an appropriate period for investigation of potential issues pertaining to safety, quality or regulatory compliance.

At a minimum retention samples shall be retained for the following categories:

- Woolworths branded pre-packed produce

Product assessment is to be carried out during and at the end of the shelf life and documented records of all checks shall be maintained. Woolworths may request retention samples to be submitted to assist with an investigation of potential food safety or quality issues for Woolworths branded products.

**15.5 INTERNAL AUDITS**

The organisation shall implement a 6 monthly internal audit program or an equivalent schedule which reviews all elements of the Quality Management system and this standard.

Audits need to be scheduled and conducted at a frequency which represents the level of risk determined for the system or procedure.

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Internal audit scope shall focus on all elements of the Standard, which includes HACCP. The audits shall be completed by competent internal auditors who are able to assess and communicate the outcomes of the audit process. Auditors shall be able to demonstrate evidence of auditing skill. Responsibilities and frequencies shall be defined.

The results of the internal audit shall be communicated to the personnel responsible to establish corrective action and the respective timeline for completion. Corrective actions shall be reviewed for completion and effectiveness in resolving the identified problem. The records of internal audits and corrective actions shall be maintained and available for review.

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## 16. Corrective Action

The Vendor shall ensure Corrective Action occurs whenever there is a breakdown or failure identified with the product or the Quality Management System. This includes:

- Customer complaints
- Customer rejection of product
- Internal rejection of product or downgrades (non-conforming product)
- Non conformances identified through internal, second party or third party audit(s)
- Any issues communicated by suppliers of raw materials or process inputs

Corrective action is required to be documented in all cases. This shall include a review of the following questions in relation to affected product:

- What went wrong
- Why did it go wrong
- What was the impact on the product affected
- How much product is affected
- What will happen to the product affected
- How has the immediate issue been solved such that subsequent production is not affected

Procedures shall be developed, documented and implemented to ensure:

- Unsafe product is securely disposed (including secure disposal of packaging)
- Non-conforming product is identified, disposed, downgraded or reworked such that the product becomes within specification and quality is not compromised
- Decisions regarding product are only made by authorised, trained and accountable personnel
- Consideration has been given to common product, raw materials, events, equipment and personnel to ensure the scope of the issue has been correctly and fully identified.
- Corrective action is carried out appropriate to the size and scope of the issue identified. This shall include product or material testing where relevant.
- Corrective action is carried out in a timely manner as required by the size and scope of the issue or by the instigating body.
- All corrective action shall be verified before final close out
- All corrective action shall be closed out

Management shall participate in the review of corrective actions and ensure the root cause of the failure has been identified and modified or corrected to prevent reoccurrences. The preventative action taken shall be documented.

Management shall consider resource provision as a potential root cause of system or product failure.

Woolworths QA Team shall be informed of issues regarding product safety, quality or regulatory compliance where other Woolworths products or Vendors could be affected.

Where Woolworths has informed the vendor of a safety, quality or regulatory compliance issue appropriate action is implemented and documented. Documentation of all non conformances, corrective action investigations, root cause analysis and related close out information shall be available to Woolworths upon request.

## 17. Incident Management

### 17.1 BUSINESS CONTINUITY PLAN

The vendor shall carry out a risk to business assessment of:

- Man made events eg. criminal acts, malicious contamination, work place violence, accidents, fire, bomb threats, terrorism
- Natural disasters eg. earthquakes, floods, bushfires, thunderstorms, sudden deaths, pandemics

The vendor shall develop, document and implement an effective incident management plan which shall include ways to:

- Reduce the probability of a incident occurring
- Respond to a crisis situation
- Recover from a crisis

The crisis management plan shall be developed relevant to each specific business and site. The documentation shall include the following as a minimum:

- Key personnel (including crisis team roles, responsibilities and interactions)
- 24 hour contact details for key personnel
- key resource provider details, including utilities
- Details of internal/external stakeholders and contact details (including current emergency services, key external service contacts, contact for Woolworths)
- Site drawing and evacuation plan
- Details for management of people including employees with means and procedure for contacting employee families
- prioritisation of tasks during and post crisis
- data recovery / IT system backup
- communication ie employee families, Woolworths, suppliers, media

The plan shall be tested internally on a minimum annual basis using different scenarios at each test occasion Eg. natural disaster, loss of site services or IT systems, tampered product. The entire plan shall be reviewed and updated at least annually.

A post incident management briefing shall be carried out and documented in both real and test scenarios. This shall include an assessment of cause of crisis, risk of re-occurrence, identification of system improvements required, communication to employees, communication with third party stakeholders, replenishment of emergency supplies, damage reports, maintenance.

Please refer to "Develop a Business Continuity Plan" for further guidance

### 17.2 PRODUCT WITHDRAWAL / RECALL PROCEDURE

Woolworths QA Team shall be informed of issues regarding product safety, quality or regulatory compliance or where appropriate actions include product withdrawal or recall.

*Please refer to "Withdraw or Recall a Product"*

The Vendor shall have an appropriate product withdrawal/recall procedure for all products outside the control of the consumer and supplied to Woolworths Limited. This documented procedure shall:

- Identify at least one trained staff member and a deputy subject to business size responsible for co-ordinating product withdrawal / recall. The Vendor shall ensure a trained staff member is available during all business hours.
- Reflect the procedure for each Woolworth's division to which products are supplied. (i.e. Supermarkets, etc.) including the online password and website details if applicable.

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- Require communication to Woolworths of any quality/safety/regulatory issues which may lead to a product withdrawal/recall and advise Woolworths within 60 minutes of the decision to withdraw / recall
  - Differentiate procedures between a withdrawal and a recall (including, internal responsibilities, who to contact (both internal and Woolworths (including after hours), personnel responsible for the investigation, how it is investigated, details of how information is communicated/gathered (including access to online system notification and/or information if applicable), a current list of Customers and Government Authorities and any required subsequent follow-up meetings with Woolworths to review corrective actions and way forward
  - Include a mock recall procedure - all Vendors shall ensure the recall procedure is in place to effectively demonstrate case scenario, diary, trace back and contacts, by performing a different mock recall at least annually. These are to be internal only and Woolworths shall not be contacted. Records of these mock recalls shall be maintained and be available on request by Woolworths. The mock recall procedure shall be undertaken on a product supplied to Woolworths; conducted by the nominated vendors internal recall/withdrawal team; and consideration shall be given to complexity of the end to end supply chain as part of the mock recall procedure.
  - Include all activities relating to a recall or withdrawal which shall be documented and reviewed to determine its effectiveness. Records shall document who was contacted, what the problem was, who acted upon it and how it was resolved.
  - A prior notification process is required to Woolworths QA if any other product or like product, which is supplied by the Vendor (but not supplied to Woolworths) is affected by a recall.

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## 18. Product Validation

All data and product information on pack shall be treated as a claim and shall be validated.

Where product claims are intended to be used on the product label, the following supporting documentation shall be maintained to ensure accuracy:

- Where Certifications are available, Certificates shall be maintained and reviewed on a minimum annual basis to verify validity.
- Certification standards and reference material to support the validity of the systems utilised
- Product testing to verify accuracy of claims by 3rd party independent laboratory on an annual basis. This should be carried out at the appropriate point in the shelf life of the product.
- Any supporting literature to demonstrate appropriateness of claims
- Full traceability and/or chain of custody shall be demonstrated

All product claims including, **but not limited to** the following, shall be verified in full with formal approval from Woolworths to utilise claims on product labels:

- Sustainability Claims e.g. Rainforest Alliance, Fair Trade
- Nutrient Claims e.g. Gluten Free, etc.
- Country of Origin
- Organic / Biodynamic

The integrity of all products supplied to Woolworths Ltd. shall be guaranteed. All products shall be handled in a manner which prevents contamination or substitution with products which are not compatible with the certified claim standard. Vendors supplying products to Woolworths shall ensure the claim status of products is maintained from raw material procurement to end of shelf life.

Vendors shall ensure all products supplied to Woolworths fall within the scope of their Claim Certification both for themselves and also any of their suppliers of ingredients. All Woolworths branded labels product claims are to be approved by Woolworths.

A Vendor supplying products with claims shall ensure they have an Approved Supplier Program which demonstrates third party HACCP Certification for all food suppliers and relevant Claim Certification for all food ingredients and products. The Approved Supplier Program shall form part of an extensive review on an annual basis to guarantee the Claim status of all their suppliers.

All claim products shall be tested in accordance with the WQA Standard - Appendix 2 – Microbiological and Chemical Requirements for the relevant category. Chemical and / or Microbiological testing is required to validate the organic and or any other claim status of the product, where applicable.

To meet the requirements as an approved supplier of organic products to Woolworths, vendors need to demonstrate organic certification is from a body Woolworths deem acceptable and is in place for product supplied.

*Please refer to “Contact a Woolworths Approved Certification Body”*

## 19. Ground, Water and Crop Management

### 19.1 Agricultural Sites

A risk assessment shall be undertaken on new or existing sites where the risks have changed to ascertain if the site is suitable for production. It shall include but not be limited to the following:

- Site history (cropping / stocking, non agricultural functions)
- Hazard Contamination (including the use of previous chemical applications to soils i.e. heavy metal if applicable), where applicable control measures shall be applied and maintained before or during crop production
- Water (including the potential for chemical, microbial and physical contamination)
- Adjacent land / crops / usage
- Applicable regulatory requirements

### 19.2 Ground

- Untreated or Treated sewage, human effluent, or biosolids shall not be applied to growing sites or potential growing sites ex. through irrigation, soil preparation etc.
- Appropriate measures shall be undertaken to reduce risk of contamination of growing area i.e. physical barriers, buffer areas, pasteurisation of fertilisers etc.

### 19.3 Water

- Raw sewerage flow into irrigation water sources shall be controlled
- Water used a suitable quality at the time of use (i.e. while growing, harvesting or postharvest)
- Equipment used to irrigate (or fertilise etc.) shall be inspected to ensure it is working order and flushed, as required, before use.
- Water used in hydroponics like and indoor systems shall be regularly monitored, and / or changed to minimise contamination (this shall include any system that uses recycled water) that may affect the safety or quality of the crop
- Water management plans shall be implemented to optimise water usage and reduce waste and contamination; this shall include all water sources used.
- Each used water source shall be tested based on a risk assessment which includes temporary contamination situations where applicable (i.e. severe storms, flooding) and shall take the characteristics of the crop into account and meet the following guidelines:
  - All water sources are monitored and maintained (including bores / water tanks) to minimize or prevent risk of product contamination (i.e. those contaminated with toxic algae shall not be used)
  - Product that contacts flood water / other contaminations shall not be harvested for sale unless it can be demonstrated the product is fit for human consumption
- Where required by law there shall be written authority from the relevant authority the water harvested etc. from particularly sources is permitted.

### 19.4 Plant material

A record of where plant material is sourced and sent shall be kept and all plant material inspected to ensure agreed specifications (including regulatory) are met before planting. Plant Material which are transported from the site shall meet all regulatory requirements / Woolworths requirements of its destination e.g. quarantine requirements

### 19.5 Crop Management

Ensure all applications (water, chemical, fertiliser, biological controls (ie integrated pest management), biocides, waxes etc.) applied to the crop (including hydroponics systems) / soil (pre and post harvest) are:

- suitable (can be justified according to label recommendations, risk and appropriate regulatory requirements or Woolworths requirements) for the pest, disease, weed or target of the intervention, and to crop applied



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- registered for use for the crop in the country of application and the country where the crop is destined for sale
  - a map of the site to enable identification of areas of application
  - purchased legally from accredited suppliers and are adequately labelled upon receipt
  - stored and applied in accordance with the manufacturers instructions and regulatory requirements and labels are legible at all times
  - stored in appropriate categories (ex. pesticide, fungicide, herbicide, or preharvest/ postharvest), where applicable
    - A review shall be undertaken at least annually to identify and action as required unusable chemicals
  - stored to prevent contamination of the crop
  - applied at appropriate frequencies to manage the pest, disease, weed or target of the intervention and does not compromise food safety

All application to crops shall allow for the delays required before harvest and / or sale to ensure all regulatory and / or Woolworths requirements are met.

A document shall be available where all applications to the crop (pre and post harvest) are recorded including but not exclusive to:

- the name of product (including active ingredients),
- identification of site
- dates of application
- dose applied (volume and concentration)
- treatment method
- dosage recommended on label
- confirmation the product is approved for use
- weather conditions (including wind direction)
- withholding periods
- exact date of harvest
- name and signature of applicator etc.

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## 20. Corporate or National Business

All relevant corporate or national businesses which have been nominated to participate in the WQA program shall be required to attain certification to the Woolworths Quality Assurance Standard (WQA). These requirements support the WQA Standard elements and corporate / national businesses are required to implement all relevant elements of this document as part of the certification requirements.

If a corporate or national office is responsible for a specific element of the WQA standard, the Quality Management System shall be audited against all the relevant requirements of the standard in addition to those in this section as detailed below. The responsibilities and functions of both the corporate/ national business and the production / processing / storage site shall be documented and be available at all locations.

Where corrective action is required (as identified by one of the processes in this section) this shall be promptly communicated to the relevant production site(s). The Corporate or National business shall verify the completion of the corrective action.

- There shall be a documented and implemented procedure to ensure all key stakeholders between corporate/national and production/processing/storage sites are involved in the follow up and close out action required for complaint closure.

### 20.1 WQA DOCUMENTATION

- Woolworths documentation (including vendor updates) shall be maintained and implemented at the production /processing / storage sites, where applicable.
- Ensure the business has full access to the current Woolworths sample submission specifications and all relevant WQA documentation is available including the WQA Standard and supporting documents.

### 20.2 MANAGEMENT REVIEWS

- Quarterly management reviews relating to Woolworths business for all key staff shall be undertaken *Please refer to "Undertake a WQA Management Review"*.
- Reviews shall incorporate input from all production / processing / storage sites relating to Woolworths business.
- Records shall be maintained and trend analysis shall be undertaken of all key verification activities from each production / processing / storage site.
- Senior Management shall review the quality management system, HACCP and the records of internal audits, corrective actions, pest monitoring and prevention, customer complaints, management of cleaning, foreign object assessment and policy objectives at least quarterly. For Vendors who supply less than 12 months of the year an equivalent review schedule shall be implemented.
- Quarterly management reviews shall include senior members of the management team representing production, technical/quality, logistics and sales/marketing (as a minimum) to ensure all areas of the business relating to Woolworths are captured.

### 20.3 CUSTOMER COMPLAINTS (refer to section in main standard)

- Procedure to be implemented for handling customer complaints, trend analysis, escalation of issues, communication with each production /processing / storage site.
- Procedure shall be in place to ensure all key stakeholders between corporate/national and production /processing /storage sites are involved in follow up and close out action required for complaint closure.
- Complaints shall be trend analysed by volume produced and complaint category as a minimum, and shall include all product produced by site as well as Woolworths branded products.

### 20.4 PRODUCT DEVELOPMENT (Applied to Woolworths Branded Products only)

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- Procedures shall be implemented to ensure full documentation of the development process and subsequent implementation into each production / processing / storage site.
  - Procedure for sample submissions to Woolworths shall ensure the sample submission specifications are included with the submission, completed by a Technical/Quality representative and samples are appropriately identified and fit for intended use.

**20.5 RAW MATERIAL SPECIFICATIONS**

- Ensure systems are in place to address all raw material inputs and collation of information for each approved supplier.
- Procedures for clear dissemination of information to production/ processing /storage sites to ensure review procedures are implemented for checking of recipes, formulations, finished product specifications and labels.
- Review of all documentation with suppliers to ensure accuracy and up to date information.

**20.6 FINISHED PRODUCT SPECIFICATIONS**

- Where Woolworths finished product specifications have been issued, a system shall be in place to ensure the most current version is promptly available to each production / processing / storage site and communicated to relevant areas of the business.
- Where no Woolworths finished product specification is available, the corporate/national shall develop finished product specifications, these shall be available to each production / processing /storage site.

**20.7 LABEL REVIEW**

- Procedures shall be implemented to verify accuracy of formulations, specifications and product labels to ensure safety, quality and regulatory compliance.
- Current product labels, including product specifications, shall be maintained by the corporate/national business.

**20.8 APPROVED SUPPLIER PROGRAM**

- Management of WQA Certification requirements for each production / processing site relating to product supply to Woolworths.
- Assessment of all raw material inputs and service providers e.g. contract packers, transport, warehousing, maintenance providers for all products supplied to Woolworths to ensure ingredients / services are sourced from approved suppliers.
- Ensure approved supplier lists are communicated to each production / processing site for raw materials, service providers etc.
- Verification of producers/ processors, raw material suppliers and service provider to ensure compliance with WQA requirements.
- Any new producers/ processors / service provider etc. shall be reviewed by the corporate/national business to assess capability and understanding of Woolworths WQA requirements. These on-site reviews shall be documented and records maintained.

**20.9 VERIFICATION TESTING**

- Where businesses are responsible for 3<sup>rd</sup> party production /processing / storage sites, testing of food safety outcomes shall be conducted on an annual basis by the corporate/national business as part of their own internal verification program.
- Quality assessment procedures shall be implemented to ensure compliance to product specifications with records maintained of the reviews.

**20.10 WITHDRAWAL / RECALL PROCEDURES**

Procedure shall reference all requirements and responsibilities relating to withdrawal and recall procedures. *Please refer to "Withdraw or Recall a Product".*

**ACKNOWLEDGEMENT**

Woolworths Group QA team wish to formally acknowledge the significant contribution made to the WQA Food Standards by Margaret Cole. In 2011 we sadly lost Margaret to Melanoma. Margaret's contribution to Version 8 was missed.