Audit Report

1.Audit Summary			
Company name	Gurusharanam Agro Foods Private Limited	Site Code	10000245
Site name	Gurusharanam Agro Foods Private Limited		
Scope of audit	Cleaning, Steaming, Parboiling, Drying, De-husking of Paddy and Milling, Sorting, Grading of Rice and its packing in Laminated Poly Pouches, BOPP bags, Non-woven bags, Jute Bags		
Exclusions from scope	None		
Justification for exclusion	NA		
Audit Start Date	2022-01-28	Audit Finish Date	2022-01-29
Re-audit due date	2023-01-29	Head Office	No

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

2. Audit Results					
Audit result	Certificated	Audit grade	B	Audit type	Announced
Previous audit grade	B	Previous audit date	2021-01-29		
Certificate issue date	2022-03-10	Certificate expiry date	2023-03-12		

Number of non-conformities		
	Fundamental	0
	Critical	0
	Major	1

2. Audit Results

	Minor	6

3.Company Details

Address	<table><tr><td>Address 1</td><td>Nadana Road, Taraori, Karnal, Haryana –132116, India.</td></tr><tr><td>Address 2</td><td>NA</td></tr><tr><td>Address 3</td><td>NA</td></tr><tr><td>City</td><td>Karnal</td></tr><tr><td>State or County</td><td>Haryana, INDIA.</td></tr><tr><td>Post or Zip Code</td><td>132116</td></tr></table>		
Country	India	Site Telephone Number	+919355400001
Commercial representative Name	Mr. Mohit Sardana	Email	mohit.sardana@gafoods.in
Technical representative Name	Mr. Mohit Sardana	Email	mohit.sardana@gafoods.in

4.Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3

Shift Pattern	General Shift- 09.00 to 20.00
Subcontracted processes	No
Other certificates held	HACCP
Regions exported to	North America Europe Other Choose a region

4.Company Profile

	Choose a region Choose a region
Company registration number	APEDA Registration-Cum-Membership Certificate no. 158377 validity till 31.03.2026
Major changes since last BRCGS audit	No major changes since last audit

Site under audit is M/s Gurusharanam Agro Foods Private Limited which is a HACCP certified company. It was started in year since 2008. Company is a Private Limited Firm.
Company mainly exports Rice as product to North USA, Europe, Middle East & Asian countries.
Total premises area is 17067.77 Sq. meter. The build-up area is 4000 Sq. meter. Rest is open land.
Processing capacity of the company is 20MT/Day milling capacity for Rice. The current utilization is 20MT/Day on average. Company is provided with Receiving area, Storage area, Cleaning plant, Drying system, Steaming plant, Milling plant, Packing area and Dispatch facilities. Plant is working in single shift/day with maximum 45 employees in single shift. There is one HACCP study for single product- Rice.
Legal compliance checked are:
Factory Udyog Aadhar number under MSME scheme as small enterprises is evident as Number-HR10B0002510 dated 01.12.2008.
Organization has FSSAI License as Lic. No. 10815010000049 dated 10.04.2019 valid till 12.04.2022.
Company has valid APEDA Registration-Cum-Membership Certificate no. 158377 validity till 31.03.2026, Import Export code no. 3308003562 dated 12.09.2008 is evident.

5.Product Characteristics

Product categories	15 - Dried food and ingredients Category Category Category
Finished product safety rationale	Products are agro based commodity products and self-stable due to low moisture content in final product i.e. 13% max. Products needs full cooking before use.

High care	No	High risk	No	Ambient high care	No

Justification for area	There is no cooking step in processing. Products need Ambient storage conditions for all product varieties. Only low risk principles & enclosed area are applicable as per product type & processing methods for area

5.Product Characteristics

Allergens handled on site	None Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	None
Product recalls in last 12 Months	No
Products in production at the time of the audit	Rice

6.Audit Duration Details

On-site duration	18 man hours	Duration of production facility inspection	9 man hours
Reasons for deviation from typical or expected audit duration	Audit time given includes half hour lunch time on-site during both days		
Next audit type selected	Unannounced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2022-01-28	9.30	19.10
2	2022-01-29	9.25	19.10

	Auditor number	Name	Role
Auditor Number	22168	Vikas Kumar	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr. Mohit Sardana/Director	X	X	X	X
Mr. Mithlesh/FSTL	X	X	X	X
Mr. Rinku/Supervisor	X	X	X	X
Mr. Hitesh/Manager Export	X	X	X	X
Mr. Rajkumar/ Manager Stocks	X	X	X	X

GFSI Audit History

Date	Scheme/Standard	Announced/Unannounced
2020-12-29	BRC Food Global Standard	Announced

Non-Conformity Summary Sheet

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

Critical			
No.	Clause	Detail	Ant. Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	4.11.8.3	Monitoring plan for environment monitoring is documented although swab test reports are not available for verification against yearly frequency documented in monitoring plan.	We have sent Environment Swab samples to external lab. Test Analysis & reports available now. Test Reports are attached.	We have given instructions to the FST to complete all environment related tests in time. We will approve more external laboratory to avoid this in future.	Due to COVID pandemic lab representative did not come for sampling.	2022-02-24	Vikas Kumar

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

Minor							
1	1.2.1	Evidence for Job & Responsibilities review for year 2022 is not available.	Job and Responsibility is now reviewed and documented now. Document is attached.	Management has suggested HR personal to do all review on scheduled time to avoid this in future.	It was not completed by HR Person in time.	2022-02-24	Vikas Kumar
2	2.6.1	It was checked that Process flow diagram verification check record is not available as per yearly frequency.	Process flow diagram verification is done now and documented. Verification record is enclosed.	FST has been instructed to complete it in time. FSTL will monitor it before next audit.	Due to Covid-19 restrictions the scheduled verification was not completed in time.	2022-02-24	Vikas Kumar
3	4.8.3	Provision for storage & keeping place for Used & unused protective clothing is not identified or marked in change room.	Identification label has been pasted now for used and clean clothing. Photo & All NCR closure Training record is attached.	Cleaning team has been instructed to keep all labels intact to avoid this in future.	During cleaning activity, cleaning person removed the label, and forgotten to re-placing those labels.	2022-02-24	Vikas Kumar
4	4.11.6	Cleaning tools were not found kept at the identified place.	One dedicated area for keeping cleaning tools like brooms etc. is marked now. Photo attached.	Cleaning tool storage area is identified & cleaning team is informed to keep all cleaning tools at identified place.	Area was dedicated but not marked or labelled. By mistake cleaning person left tools at wrong place.	2022-02-24	Vikas Kumar

Minor							
5	4.14.6	01 EFK not found working at the process section	Insect killing machine is repaired now and function properly. Photograph is attached.	We will keep checking all devices to avoid this in future & do planned maintenance in time.	Electric plug was not working at the time of audit.	2022-02-24	Vikas Kumar
6	7.2.1	02 workers were observed with restricted items in hygiene policy i.e. threads & watch in production area.	During audit immediate action taken and instructed those workers to remove the thread and watch. Training on Jewellery Policy and Photo of worker without wearing ring attached.	After this we will give awareness trainings for all workers to follow the policy.	By mistake that worker missed to remove the threads & ring.	2022-02-24	Vikas Kumar

Minor							

Comments on non-conformities
Comments

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit due date

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

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

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Quality & Food safety policy is documented as F/GAFPL/FSQP/01 issue 1.0 dated 01.04.2020. It was approved by Director. Policy shows management commitment to meet legal & customer requirements. Communication channels are established and take place through meetings, trainings. Display of policy is done in Office, QA/QC Lab, Change rooms and entrances of factory. This is made in English language. Interviewed Director Mr. Mohit Sardana, Managing Director Mr. Gian Sardana, Mr. Mithlesh (Quality Manager) for their understanding of the system & it was found good.

SOP for Food safety & Quality culture plan is documented as- Annexure-O dated 01.04.2020. It includes Planning of Survey, Communication, Culture Excellence, Dimensions of Food safety culture, Teamwork, Rewards, Empowerment, Process, Rewards, Training, Co-ordination and Consistency. Plan cum key performance indicator is documented for year 2021-22. Food safety culture survey has been conducted. It is based on 15 questionnaire system. Target kept is 80-90 score. Score calculation system is developed & established for culture surveys. Result calculation is done by fixed formula on the basis of answer given by each employee. Last survey was done on quarterly basis & last completed in Dec.21 on date 01.12.2021 & before that Sep21 on date 30.09.2021. Food safety culture trackers are made & are documented. Survey result is evident. Training was given to all employees on date 25.10.2021 by external trainer for duration 02 hours.

Food safety & quality objectives of the organization for financial year 2021-22 are evident. Following objectives and targets identified & reviewed as per document- F/GAFPL/FSQP/01 issue 1.0 dated 01.04.2020. Frequency for review is monthly. Last review was done in Dec21.
The objectives were-

- Customer Complaints should not be more than 05 in a year. Status- Nil in year 2021 & 2022 as on date.
- Minimum 03 hours training for all employees. Status- Jun21 to Jan22 as on date, total Trainings conducted 16 in number. Status is achieved on monthly basis. Training tracker is evident- F/GAFPL/MR/03/03.
- To maintain GMP score above 90% in hygiene audit conducted on monthly basis for financial year 2021-22. Results checked from Jun21 & Jan22. The average score was 91.22%.

Management review is carried out on once in a year frequency. Agenda points were 16 in number & covered all the requirements given in BRC standard. Last management review was held on date- 29.09.2021. Next is planned in Sep.22. Management review was headed by all Snr. Managers participated in the meeting. Meeting attendance sheet is evident. Management output is recorded. Ref. Minutes of meeting- F/GAFPL/MR/03/02.
Site Snr. management do a monthly review meeting for the topics discussed like Food safety, quality related issues, legality & integrity concerns, Customer complaints, Non-conforming products, agenda points from last meeting, Changes in rice industry etc. Checked minutes of meeting- F/GAFPL/MR/03/04 from last meeting on 31.12.2021 & 30.11.2021.

Documented system is established for confidentiality reporting system by internal staff. Whistle blowing policy is documented as- GAFPL/SOP/MR/11A dated 01.04.2020 is evident & found displayed at few relevant positions. Suggestion box, email i.d. and telephone number is provided for all employees & access

to suggestion given is with Director only. A reward system is in place for right reporting. It is driven by HR dept. Training was given to all employees on date 25.10.2021 by external trainer for duration 02 hours. Suggestion box monitoring record is found maintained appropriately.

Resources are provided to the organisation's needs. Site under audit is M/s Gurusharanam Agro Foods Private Limited which is a HACCP certified company. It was started in year since 2008. Company is a Private Limited Firm.
Company mainly exports Rice as product to North USA, Europe, Middle East & Asian countries.
Total premises area is 17067.77 Sq. meter. The build-up area is 4000 Sq. meter. Processing capacity of the company is 20MT/Day milling capacity for Rice. The current utilization is 20MT/Day on average.
Company is provided with Receiving area, Storage area, Cleaning plant, Paddy Drying system, Steaming plant, Milling plant, Packing area and Dispatch facilities. Plant is working in single shift/day with maximum 45 employees in single shift. There is one HACCP study for single product- Rice.

Legal compliance checked are:

- Factory Udyog Aadharnumber under MSME scheme as small enterprises is evident as Number-HR10B0002510 dated 01.12.2008.
- Organization has FSSAI License as Lic. No. 10815010000049 dated 10.04.2019 valid till 12.04.2022.
- Company has valid APEDA Registration-Cum-Membership Certificate no. 158377 validity till 31.03.2026.
- Import Export code no. 3308003562 dated 12.09.2008 is evident.
- Pollution control board consent no. 2815120KARCTO7743205 dated 23.07.2020 validity till 30.09.2025.

Top management takes part in various seminars organized by legal & regulatory bodies. Organization has hired technical consultants for regular updates on market issues related with products. Senior Management receives mails & communication from all these boards on regular intervals related with the food safety, legality & quality related issues. Overall Information review is done four times in a year at the time of Internal audit.

Company has an original hard copy of BRC Food Standard issue 8.0 standards.

This is 2nd BRC audit for this facility.

Top management & Senior managers attended both opening and closing meeting. Department heads/ Managers from Quality, Production & Purchase were also available during round of facility and auditing and attended opening & closing meeting.

No use of BRC LOGO by the site

1.2 Organisational structure, responsibilities and management authority

Organization structure chart is evident as Annexure-K of GAFPL/SOP/MR/08 dated 01.04.2020. Team is headed by the Top management- Managing Directors. Unit is headed by Director. All other Senior management & staff reporting to Director.

Job specifications & descriptions are defined in the Annexure- GAFPL/SOP/HR/02 dated 01.04.2020. Verified R & A for MD, Director, QC Head, Production Head, Stores cum Despatch in-charge, FSTL, IPQC etc.

Competency matrix- F/GAFPL/HR/01/11 is evident dated 01.04.2020 for all employees.
Although, Evidence for Job & Responsibilities review for year 2022 is not available. One minor NC was raised against cl. 1.2.1

Authority Absence arrangements are done & recorded in the documents. Employees are found aware of their responsibilities.

Employees are found aware of their responsibilities. Responsibility matrix & skill matrix is evident as FSR/HR/02 dated 01.02.2019

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
1.1.13	LOGO is not used. This is First certification for the company against BRC food standard 8.0.

2 The Food Safety Plan – HACCP

HACCP Manual is documented. HACCP system is last reviewed on date 01.04.2020. Last HACCP review was done on date 01.04.2021.

HACCP team was established and evident in FST approval document dated 01.04.2020 Annexure-A Doc. no. GAFPL/SOP/MR/08. Team is consisted of 09 multifunctional members. Minimum requirement is defined. Qualification & experience of the team is defined. Mr. Mithlesh (QA/QC In-charge) is identified as FSTL. He is having more than 08 year experience in same rice line. Mr. G. Sardana is assigned as deputy FSTL. He is B. Tech. in Dairy Technology plus more than 41 years' experience). FSTL is reporting to Top management. FSTL is trained in ISO 22000:2005, BRC awareness & HACCP. Records are evident. Interviewed HACCP team for their understanding of the system & it was found good. Internal training records for FST are verified as:

- BRC/HACCP awareness training was given on date 01.10.2021 by external trainer to persons for 06 hours.
- CCP/OPRP training was given on date 08.11.2021 by external trainer for 02.45 hours.

Competency matrix- F/GAFPL/HR/01/11 is evident dated 01.04.2020 for all the Team document. External consultant was used for development & documentation of the system. Scope is defined in documents.
Last HACCP review was done on date 01.04.2021.
External consultant is also used for New developments/Awareness/Trainings & documentation of the system.

Scope is well defined in BRC Manual i.e. Production of Rice packed in Laminated Poly Pouches, BOPP bags, Non-woven bags, Jute Bags. Plant has capacity of production of rice directly from Paddy & also from raw rice to finished sortex cleaned rice both.

No paddy was purchased in year 2021. Only raw rice to finished rice operations were carried out in year 2021.

PRPs are documented in HACCP Plan & documented SOPs from- GAFPL/SOP/PRP/01 to 11. PRPs are controlled through SOP & records. Organisation covers procedures for the cleaning and maintenance of plant surroundings and production areas, Infrastructure control, equipment maintenance & calibration, personal hygiene practices, staff training, RM purchasing & handling, transportation, prevention of cross contamination and allergen control etc. These programs are considered for the Hazard analysis and reviews The company ensures that the HACCP study is based on comprehensive information, which is referenced and available. This includes the latest scientific literature, historical and known hazards associated relevant codes of practice, recognised guidelines & regulations as FSSR 2011, USFDA, Competent Authority guidelines, food safety legislation of products in destination countries.

OPRP-01: OPRP01 as Destoner, Hazard- Stone. Significant: Yes. Critical Limits- Nil stone contamination in final products during pass from Sieve size- 1.2mm or 12 mesh size. Monitoring plan- Every shift. Responsibility- Supervisor/Operator. Corrective action, Verification is defined in OPRP Plan. Daily Destoner monitoring sheet- F/GAFPL/OPRP/01 is evident. Monitoring record is verified for period Sep20to Jan21 as on date. There was no deviation observed as per record & staff interviews. Sieves were checked during on-site production inspection & found cleaned in condition

OPRP-02: OPRP02 as online 04 Magnets, Hazard- Metal Iron hazards. Significant: Yes. Critical Limits- 10000gauss minimum. Monitoring plan- Every 12 hours. Responsibility- Supervisor/Operator. Corrective action, Verification is defined in OPRP Plan. Daily Magnet monitoring sheet- F/GAFPL/OPRP/02 is evident. Monitoring record is verified for period Sep21 to Jan22 as on date. There was no deviation observed as per record & staff interviews. Magnets were checked during on-site production inspection & found cleaned in condition.

Product description is defined in HACCP Manual. Verified document no. Annexure-B Doc. no. GAFPL/SOP/MR/08 dated 01.04.2020. Products are types of Rice packed in Laminated Poly Pouches, BOPP bags, Non-woven bags, Jute Bags. The export of rice is controlled through regulatory bodies like APEDA guidelines & EIC.
Raw materials are Paddy & Raw rice & described as- Annexure-D Doc. no. GAFPL/SOP/MR/08 dated 01.04.2020. Packaging material is of different types like Laminated Poly Pouches, BOPP bags, Non-woven bags, Jute Bags& mainly used as per customer demands & specifications provided by customers.
Full description of the products is developed including detail of raw materials and their origin, packaging and delivery methods, packaging material configurations, RM & finished goods specifications, storage requirements, shelf life, preparation requirements before use, distribution control, labelling requirements and acceptance criteria. Source of raw material is from local approved supplier.
Shelf life of the final product is 02 years at ambient condition.
Intended use is defined as- Annexure-C Doc. no. GAFPL/SOP/MR/08 dated 01.04.2020. The product is ready for the consumption of the human being as staple raw food & need a full cooking. Usage Instruction: Raw product to be fully cooked before consumption.

Allergen risk assessment is done for product & raw material & recorded. Raw & Finished products are found free from any allergen given in BRC list of 14 allergens.

Process Flow chart is available as- Annexure-M Doc. no. GAFPL/SOP/MR/08. All aspects are covered in the process flow diagram included recycling. PFD starts from receipt of material & end up to Shipment with all steps in total. Product is low risk agri based product. There is no outsourced process or job work. Sequence & Interaction of process is defined. Areas identified as Low risk & enclosed area only on the basis

of risk assessment carried out by FST as per BRC guidelines. Recycling is defined in the process flow diagram. Although, It was checked that Process flow diagram verification check record is not available as per yearly frequency. One minor NC was raised against cl. 2.6.1

Documented Hazard analysis is documented as- Annexure-E Doc. no. GAFPL/SOP/MR/08. Risk is calculated as- LOC*Severity= Risk. Likelihood of occurrence of hazards, Severity & risk was calculated through means of evaluation by rating scale.
Likelihood of occurrence rating as- High risk means-3, Medium 2 & Low-1.
Severity is calculated as- Critical- 4, Serious- 3, Major- 2 & Minor- 1.
If LOC*Severity= Risk score is more than 06 then hazard was considered as significant. If risk rating is equal to 6 or more then hazard was considered as significant. CCP decision tree is used for further assessment of hazard & established control measures. If rating is <6 then hazard is controlled by PRP.

HACCP decision tree is used to check for significance & decision for CCPs. It is done as Codex Alimentarius guidelines for HACCP.
Control measures are further assessed on 07 questions to identify CCPs & OPRPs.

It is done as Codex Alimentarius guidelines for HACCP. Control measures are established, evaluated & documented in Hazard analysis study. For each hazard that requires control, control points are reviewed to identify those that are critical. This is based on a logical approach and is facilitated by use of a decision tree. Details of application of CCP decision tree on identified significant hazards were there in place.

CCP chart is identified in the all product range. Details of application of CCP decision tree on identified significant hazards were there in place. 02 CCPs are identified as:

- CCP-01: CCP as Paddy Drying Step. Hazards: Biological, Significant: Yes, CL: Moisture% in output paddy is below 13%. Monitoring procedure- Moisture Content checked through Moisture meter by Operator& QC verification as per 03 times in a shift. Ref. Records Dryer Log Sheet- F/GAFPL/CCP/01. Verification by QA & record is maintained. Corrective action, Verification system is defined in CCP Plan. On average moisture% is to be maintained near to 11.5 to 12.5%.Monitoring records are verified. There was no deviation observed as per record & staff interviews.
- CCP-02: CCP as Online Metal Detection in Finished product, Hazard- Metal hazards. Significant: yes. Critical Limits- Fe: 1.2mm, Non Fe: 1.5mm and SS: 1.8mm. Monitoring plan- 03 times During every shift through Metal test piece. Responsibility- Supervisor/operator. Verification by QA as once in a day. Corrective action, Verification is defined in CCP Plan. Daily Metal detector sheet- F/GAFPL/CCP/02 is evident. Monitoring record is verified for period Dec21to Jan22 as on date. There was no deviation observed as per record & staff interviews. Metal detector was checked during on-site production inspection & found working in condition.

The HACCP food safety team had conducted validation for the CCPs & control measures. Verified the CCP Validation Report.

- CCP-01: In-house Validation record of Dryer is evident & last done on 31.05.2021.
- Also, Calibration certificate for RTD provided in Dryer is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00965F are evident. It was done on 13.01.2022 & due on date 12.01.2023.
- Calibration certificate for Moisture Meter is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/220113.4.1 are evident. It was done on 13.01.2022 & due on date 12.01.2023.
- CCP02: Metal detector- Validation reference: Last done on date 24.08.2021 by Manufacturer. Ref. Taken was FDA Guideline – Compliance policy guides – CPG Sec. 555.425 foods, adulteration. Calibration certificates are given for metal probes test pieces.
- Calibration certificate for Vernier Calliper is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00990 are evident. It was done on 14.01.2022 & due on date 13.01.2023.

- Calibration certificate for Pressure Gauges provided in Boiler is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00966F & AACPL/00967F are evident. It was done on 13.01.2022 & due on date 12.01.2023.

Monitoring records are verified. CCP monitoring records are maintained. All CCPs have been validated. In-house data are available for all CCPs.

Corrective actions were written in the HACCP plan. No deviations were observed in CCPs as per company records.

Procedures of verification is established to confirm that the HACCP plan is effective in the form of internal audits, review of CCP records on a daily basis, review of customer feedbacks including complaints. Documentation and record keeping is sufficient to assist the company to verify that the HACCP controls are in place and maintained.

HACCP Review frequency is at least once in a year. The HACCP plan was reviewed last on 31.05.2021 having frequency once in a year or any changes.

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

3. Food safety and quality management system

3.1 Food safety and quality manual

No Changes are there in food safety and quality manual since last BRC audit updates of new issue, policy, and / procedure and HACCP amendment. The BRC food safety and quality manual is evident as GAFPL/FSQM/01 dated 01.01.2020. It is consider as Level 1 document. Level 2 are Policies, SOPs & SSOPs. Level 3) are work instructions & Level 4) is formats/ records. SOPs are distributed to related departments. Distribution list is provided in each SOP. Documents are legible & are in appropriate language. Work instructions are displayed at relevant locations. HACCP, Quality manual, SOP manual & GMP manual is distributed to GM, Maintenance Engineer, Production Manager and Quality Manager. Organisation has work instruction, SOP manual, GMP manual, HACCP manual, Quality Manual, Lab manual etc. for effective operation. There are displays of various procedures, do's & don'ts in pictorial & written forms in English and Hindi language at various locations of the production area, walk ways, laboratory etc.

3.2 Document Control

Procedure for Document Control is evident as- GAFPL/SOP/MR/01 dated 01.04.2020. Master list of documents is updated as per latest changes in documents & formats- F/GAFPL/MR/01/01. Distribution plan is also maintained. Key documents are BRC manual, Quality/Food safety Procedures, External standards documents, Formats, Work Instructions, Specification sheets, Reference documents, Customer related documents. Company reviews the latest version of the documents once in a year & last was done on 01.04.2021. Changed document copy is kept as obsolete document copy with obsolete document stamp. Last changes were made on date 01.06.2020 in documentation.

3.3 Record completion and maintenance

Procedure for Document Control- GAFPL/SOP/MR/01 dated 01.04.2020. Master list of records is updated as per latest changes in documents & formats- F/GAFPL/MR/01/01. Records are identified & maintained. Records are retained as per defined retention time. Quality record retention time is 03 years min. Records are detailed in English & local language. Records are available, maintained in good conditions.

3.4 Internal audits

The internal audit procedure is documented as- GAFPL/SOP/MR/07 dated 01.04.2020. The frequency of the Internal audit is spread on departmental wise through out of the year. The internal audits are conducted by Internal approved auditors.

The Internal audit plan for year 2022 is evident- F/GAFPL/MR/07/01. Risk assessment for departmental/activities for internal audits is not available.
Internal audit schedule is evident as- F/GAFPL/MR/07/02. Internal auditors were independent & competent as found during interviews.
Verified Internal audit carried out on dates 06.01.2022 for Quality control dept. and 05.01.2022 for Production dept.
The audit checklist is available as- F/GAFPL/MR/07/03. Internal audit checklist as per BRC guidelines was evident for all Internal audits.
Internal audit non-conformities were recorded in format- F/GAFPL/QA/07/04. 03 CARs were raised in internal audit for Production & QC dept. on date 05 & 06.01.2022. All were closed before this audit. Details of CAPA & Root Cause analysis are evident.
Verified the GMP checklists and records to be performed on monthly basis. Also, Hygiene Audits/Inspections to be carried out on daily basis in respective areas. GMP checks, Cleaning & Hygiene check records verified as:

- Organization performs Monthly GMP checks as per record- F/GAFPL/MR/07/05. Reports are checked for date 01.01.2022.

- Daily General Plant Hygiene cum cleaning record- F/GAFPL/PRP/03/01 & 02 is evident.
- Daily Plant surrounding area cleaning record- F/GAFPL/PRP/03/01 is evident.
- Cleaning of tanks record- F/GAFPL/PRP/03/02.
- Daily Plant cleaning schedule- F/GAFPL/PRP/04/01.
- Daily Plant Equipment cleaning schedule- F/GAFPL/PRP/04/02.
- Daily Plant sanitation checklist- F/GAFPL/PRP/05/02.
- Drains monitoring checklist- F/GAFPL/PRP/05/03.
- Ware House cleaning check record- F/GAFPL/PRP/05/01.
- Daily Personal hygiene check- F/PCLFCL/PRP/02/01.
- Daily Magnet cleaning record- F/GAFPL/OPRP/02.

Limits of acceptable levels of cleaning are defined. Product is under low category risk type.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Raw material risk analysis is evident as- Hazard analysis Annexure-E Doc. no. GAFPL/SOP/MR/08 & VACCP Annexure-N dated 01.04.2020. Organization is into this business from long time from year 2008. Basically it is a typical agriculture-based industry & raw material is Paddy, raw rice & type of packaging materials. Organization purchase Paddy & Rice both as per year planning. Raw materials are purchased from Local Bulk commodity centres & also from Traders & Brokers as per requirements. Rice & primary packaging material is considered as High risk material. During interview with management & purchase staff, it was checked that No such substitution or adulteration/fraud issue was observed by the Senior management in recent years. Raw material samples are checked by responsible purchase inspector & QC Manager before purchase & only passed RM to be purchased as per instructions.
Risk assessment covered- Allergen contamination, Foreign body, Microbiological contamination, Chemical contamination, Substitution or Fraud, Radiation. Allergen assessment is performed as per BRC allergic substance requirements. There is no allergen in Raw materials & finished products.
SOP for Purchase is evident as- GAFPL/SOP/PUR/01 dated 01.04.2020. Purchase is mainly controlled by Director. Documented supplier assessment, selection, approved criteria is documented. Supplier selection based on Past experience, Evaluation & review of supplier questionnaire, sample approval, market reputation, GFSI scheme certification etc.
Paddy is mainly purchased by Local nearby BCC Bulk collection centres (Mandi) & traceability is traced with every invoice given by Traders & Brokers. Paddy survey report for financial year 2021-22 is evident. It is done for all adjoining states producing paddy.

Supplier registration & approval record & Suppliers Performance & evaluation record is maintained as- F/GAFPL/PUR/02/01. Supplier approval form- F/GAFPL/PUR/02/01 are evident for existing suppliers. Supplier evaluation report & rating for period 2020-21 is evident as record no. F/GAFPL/PUR/02/03. Supplier audit/Survey form is evident as- F/GAFPL/PUR/01/08. Records are verified for suppliers. Supplier approval record are found maintained

An updated list of approved suppliers is found available for year 2022 current season.
Vendor Questionnaire are in practice for low risk raw material suppliers for approvals as verified from supplier list. Questionnaire covers details of General GMP, Incoming controls, Process controls & In-process checks, Final Inspection & Testing controls, sanitation, Pest control, Others including Traceability. Vendor Questionnaire are in practice for high risk raw material suppliers for approvals as verified from supplier list
Exceptions to the supplier approval processes are documented in the procedure for selection & approval approach: GAFPL/SOP/PUR/01 dated 01.04.2020.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Raw material acceptance & monitoring plan is documented & established as- GAFPL/SOP/QA/01 for year 2021- 22. Raw material is also get checked from external laboratories if required by customers or by QC

dept. Packaging material is accepted on the basis of test reports/COA from Vendors. Inspection & testing plan is evident from In-house lab.
In general, First step is sample approval for trading parties in case of rice purchase & then order is given to them.
In case of Paddy first initial sample to be checked in in-house lab & then unloading is allowed as per plan.
Later second inspections are also performed at the time of incoming material. In case of Paddy purchase, First pre unloading samples & then composite Post unloading samples were checked for final acceptance.

Records Checked for RM (Inspection & Analysis report of Paddy/Rice): Record no. F/GAFPL/QA/01/01 for Paddy & F/GAFPL/QA/01/05 for Raw rice:

- Rice received from M/s Bhardwaj Overseas Private Ltd. against invoice no. SB-436 dated 18.11.2021. Total quantity received was 30MT on date 18.11.2021 as per GRN no. 3305. Incoming Check record for Rice dated 18.11.2021 is evident. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.
- Rice received from M/s B.D. Enterprises against invoice no. 6447 dated 28.06.2021. Total quantity received was 25.025MT on date 28.06.2021 as per GRN no. 376. Incoming Check record for Rice dated 17.10.2020 is evident. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.
- Paddy was not purchased in year 2021 & 2022. Checked for Paddy received from Broker M/s Kartar Singh & Sons (Local Samalkha mandi- BCC) against bill no. BS-68 date 06.11.2020. Paddy was received on date 06.11.2020. GRN gate pass no. 387 dated 06.11.2020, Total quantity received was- 703 bags (35.20MT). Incoming Check record for Paddy dated 06.11.2020. Lot stack number given was- 01. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.

PM material: Incoming PM check record- F/GAFPL/STR/01/06 is checked.

- Checked for PP bags received from M/s Lizza Ram Fabricators against bill no. LRF-1056 dated 19.11.2021. Total In-house Lab inspection report is evident. Total quantity received- 5100Pcs. Food grade certificate & COA is provided by vendor dated 18.11.2021.
- M/s A-One Tex Tech Pvt. Ltd. for Laminate Pouches. Food grade certificate & COA is provided by vendor.

3.5.3 Management of suppliers of services

Procedure for Approval & monitoring of suppliers of services is documented in the SOP for Purchase in BRC manual.

- Pest control:- Pest control is outsourced as per Order-cum-Contract of M/s Pest Mortem (India) Private Ltd. for Pest Management Services verified– contract no. 54, Period: 01.01.2022 to 31.12.2022. Previous contract with same vendor evident as Contract no. 47, Period: 01.01.2021 to 31.12.2021. Types of Services: Container fumigation/Loaded Container fumigation/ Cargo Fumigation/ Ware House Fumigation/Timber Treatment/General Insects &Rodent control/Fly Mgt. – Frequency: Alternate day. Pest control service vendor legal license verified are License no. 928 AMB dated 21.12.2017 valid upto 31.12.2022, registered no. 015/ALP valid up to 29.01.2023, license registered no. 228/MB valid up to 18.11.2022. Daily Log sheet is filled for pest inspection. Training record for service persons is evident- 17.06.2022.
- Security- Own.
- Transport, Loading/Unloading contract with External Contractor- M/s Baba Gungala Transport Co., contract is valid till 31.12.2022. Food safety requirements were communicated.
- Waste Control: M/s Jaswinder Singh dated 01.11.2021 is evident, contract is valid 31.10.2022.

- Contact for Training, Internal audit, Updates from market & System development with External Consultant agency. The contact is evident on yearly basis

3.5.4 Management of Out sourced processing

NA. There is no outsourced process.

3.6 Specifications

There is no change in product and packing specification since last BRC Audit. The specifications are available for raw material, packing material and finished products. Raw material Paddy & Rice specification were described in HACCP study.
Product description is defined in HACCP Manual. Verified document no. Annexure-B Doc. no. GAFPL/SOP/MR/08. Products are types of Rice packed in Laminated Poly Pouches, PP bags, Non-woven bags, Jute Bags. The export of rice are controlled through regulatory bodies like APEDA guidelines & EIC.
Only Raw materials are Paddy & Raw rice & described as- Annexure-D Doc. no. GAFPL/SOP/MR/08. Packaging material is of different types like Laminated Poly Pouches, PP bags, Non-woven bags, Jute Bags& mainly used as per customer demands & specifications provided by customers.
Full description of the products is developed including detail of raw materials and their origin, packaging and delivery methods, packaging material configurations, RM & finished goods specifications, storage requirements, shelf life, preparation requirements before use, distribution control, labelling requirements and acceptance criteria. Source of raw material is from local approved supplier.

Shelf life of the final product is 02 years at ambient condition.

Specification manual is identified. Raw material & packaging material acceptance & monitoring plan is documented & established. Raw material is also get checked from external laboratories if required by customers or by QC dept. RM/Packaging material is accepted on the basis of test reports/COA from Vendors.
As per company procedure, the specifications will be reviewed once in a year unless any changes to be done. Raw materials specifications include criteria against contaminants where applicable (heavy metals, pesticides, microbiological). Documented specification in company format for finished product specifications, prepared as per buyer's sample approval. Last HACCP review was done on date 01.04.2021.

3.7 Corrective and preventive actions

SOP for corrective/Preventive action- GAFPL/SOP/QA/03 & 04 dated 01.04.2020 is established. Corrective/Preventive action for the non-conformity of production, Internal Audit, Customer complaint and Incidents. Top management is reviewing the effectiveness of the Corrective Actions decided and implemented. Corrective actions are decided with target date of implementations and it is reviewed monthly by Food Safety team Leader. The corrective action is decided with responsible person with target time of implementation and it is reviewed by the Top management for its effectiveness. Internal audit non-conformances is recorded & corrective actions were evident in recorded form.

3.8 Control of non-conforming product

SOP for Non-conforming products- GAFPL/SOP/QA/02 dated 01.04.2020. Non-conforming products are identified and separated as per the documented procedure in Food Safety Procedure manual. No deviation in CCP & no Non-conforming product in year 2021& 2022 till date as per record & interview of Senior Management. Products to be keeping in the separate red marked rack if found non-conforming. Raw material samples are to be checked before purchase of Paddy or Rice. Sample if failed then it is rejected & not purchased as per QC manager.

3.9 Traceability

The company has a system of identification and trace the products with Batch Number / Item code / Lot number. It is verified. Ref. Documented procedure for Traceability- GAFPL/SOP/STR/01 dated 01.04.2020. In-house traceability check is performed by the company on once in a year basis.

Last In-House Backward traceability check record evident as- F/GAFPL/MR/03/02 was performed by the organization on date 16.08.2021. Total time taken was 02 hours. Full traceability was achieved in less than 04 hours. It was performed for Invoice no. GAF/26/2021-22 dated 17.06.2021 for Long Grain Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 24.07.2021, total quantity sent was 23.00MT,

dispatched to customer in USA, In containers no. UACU3697597 dispatched on date 24.07.2021 as per dispatch summary sheet.

Forward traceability checked on date 30.11.2021 received from M/s Bhardwaj Overseas Pvt. Ltd. invoice no. SB-436 dated 18.11.2021. Total quantity received was 30.010 MT on date 18.11.2021. Incoming Check record for Rice dated 18.11.2021 is evident. Rice was used for making batch no. GAF/64/2021-22.

On-site traceability challenge given by Auditor:
It was performed for Invoice/Batch/Job Order no. GAF/13/2021-22 dated 01.12.2021for for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.12.2021, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. TEMU1452799 dispatched on date 29.12.2021 as per dispatch summary sheet. Total time taken in traceability was 02 hours and 15 minutes.

Details:
Dispatch quality control report for Rice from in-house lab before loading is evident. Labelling, weight & quality parameters were checked by QC lab. Product was released by QC In-Charge.

Production & QC records: Production date 28.12.2021.

- Job Work order no. GAF/13/2021-22 dated 01.12.2021.
- Daily production report- F/GAFPL/PRD/01/05.
- Vehicle check record- F/GAFPL/PRP/01/06 is evident.
- Finished Product analysis report no. F/GAFPL/QA/01/05.
- In-process analysis report- F/GAFPL/QA/01/05 is evident.

Raw material: Records Checked for RM (Inspection & Analysis report of Paddy/Rice): Record no. F/GAFPL/QA/01/01 for Paddy & F/GAFPL/QA/01/05 for Raw rice:

- Rice received from M/s Tirupati Rice against invoice no. TR-1022 dated 10.11.2021. Total quantity received was 25MT on date 10.11.2021 as per GRN no. 897. Incoming Check record for Rice dated 10.11.2021 is evident. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.

PM material traceability is also found maintained as per record- F/GAFPL/STR/01/13.

Records were maintained.

There is no reworking as per management policy.

3.10 Complaint-handling

The procedure is there for the complaint handling having document number- GAFPL/SOP/MKT/01 dated 01.04.2020. One of objective is Customer Complaints not more than 5 in a year. Actual Status- Nil in year 2021 & 2022 as per management interview & verification of records. SOP covers Investigation history, Possible root cause, Corrective & preventive actions records. The format is evident as- F/GAFPL/MKT/01/01 to be used for customer complaint investigations.

3.11 Management of incidents, product withdrawal and product recall

SOP for Incident management- SOP no. GAFPL/SOP/ORM/01 dated 01.04.2020. Emergency Plan Team is defined in the procedure. An incident management procedure is documented, implemented and

maintained. Procedure includes emergency situations like Fire, Explosions, and Major spillage, occupational Emergencies / Accidents fire, flood or natural disaster, malicious contamination or sabotage. Disruption to key services such as water, energy, transport, staff availability and communications.

SOP for Product recall/withdrawal- GAFPL/SOP/MKT/03 dated 01.04.2020. Recall team is identified and 8 people are there in the team. The Director is Team leader and recall coordinator. Contact details of recall team are available in the mock recall report and are displayed in various locations in the factory. List of agencies and certification body to be informed in case of product re-call is maintained. Emergency recall team member contact numbers are mentioned in procedure. Mock recall was checked for In-house checked for In-house traceability check is performed by the company on yearly basis. It was performed for Invoice no. GAF/26/2021-22 dated 17.06.2021 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 24.07.2021, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. BMOU2840650 dispatched on date 24.07.2021 as per dispatch summary sheet. Whole batch was traced effectively as per company records.

There is no incident of Actual product recall in year 2020-21 till date as per checking of records & interview of staff.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.2.3	Organization does not receive live animals.
3.5.4	There is no outsourced process.
3.9.4	There is no re-working system. Reworking is not allowed as per the company norms.

4. Site standards

4.1 External standards

External surrounding area of the company is checked. Surrounding area is open farms& other industries. Boundary is secured & fixed by the site.
Inside External areas External areas inside the plant facility are maintained. New plan is approved to extension & concrete made roads inside the facility & will commence after the season is over in this site. & maintained in good repair conditions.
Planted area are maintained and a gap between the boundary and planted area is maintained.
The building fabric is maintained to minimise potential for product contamination.
Pest control arrangements are observed in all the areas especially for rodents.

4.2 Site security and food defence

Procedure for security is available- GAFPL/SOP/HR/01 dated 01.04.2020. It is divided broadly in external security & internal security etc. Boundary walls are provided and guarded by security personnel's round the clock. No unauthorised access is allowed. Security is strictly maintained. Visitor's tags are issued at the main gate. Minimum 01 guards including 01 supervisor remain available on the site in shift basis. Inward and outward registers are made for control on man movement and material movement. Emergency contact numbers are available & displayed. CCTV cameras are placed at various positions.

The visitor policy is available- GAFPL/POL/PRP/01 dated 01.04.2020. External personnel are to be accompanied by the company's staff while entering in the production facilities. The in-house training is provided on Site Security to persons including security guards & all assigned staff by External faculty.
Inward control is made on man movement and material movement & registers are maintained for same.

Security risk assessment- Annexure-A F/GAFPL/HR/03 dated 01.04.2020 is evident. Security checklist annual- F/GAFPL/HR/03/01 for date 01.01.2022&Deliberate Sabotage- F/GAFPL/HR/03/02 for date 01.01.2022 is evident.

Food defence plan Annexure-N GAFPL/SOP/HR/03 dated 01.04.2020. The external & internal area is covered. Also, manpower, visitors are covered during the assessment. Interviewed security supervisor & found aware about security protocol & visitor control.

Site is registered with local & National board authorities & certificates are available.

4.3 Layout, product flow and segregation

Plan of the site is updated for areas where product is at different levels of risk from contamination; that is enclosed product areas & low-risk areas only. Verified Site lay out plan and addresses access points for personnel, travel routes, staff facilities, routes of work. Man, Material and product movements are shown in the lay out plans. Separate storage areas for raw material, in-process, and FG storage facilities are maintained to avoid any possibility of cross contamination.
No high risk area as per risk analysis. No high care area is identified as per risk. No ambient high care area as per risk analysis. Processing hall is appropriate. Sufficient working space and storage capacity is provided.
Paddy can be stored in external areas within the boundary & this area is concrete build.

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

Walls are constructed of concrete/fabric & maintained as per industry requirement. Walls are maintained to prevent accumulation of dust, dirt and mould growth. This also facilitates easy cleaning.

Floors are impervious and are suitable for the intended use and withstand daily activities of cleaning and demands of the process.

Drainage is designed to minimise contamination. These are covered and maintained.

Ceilings and overheads are maintained without causing any contamination.

False ceiling was not provided in the processing facility. Windows are non-opening type. These are screened as well as per industry requirement.

Elevated walkways are provided in the processing facility but no such contamination issue was osberevd during site round.

There are glass windows provided in the production area or storage areas. All windows are adequately screened, numbered & monitored regularly.

Doors are of close fittings / screened properly and are of self-closing type. Doors are provided with strip curtain and air curtain to prevent pest entry.

Lighting is adequate. The strip lights & other lights are protected with hard plastic shatter proof covers. Tube lights are found protected and numbered in the plant.

Ventilation was satisfactory in the product storage area & processing environments.

4.5 Utilities – water, ice, air and other gases

SOP for Utility maintenance is documented are evident. Treated water is used for making hydration process of splits. Water source is bore well. Bore well water test report is evident. Water testing was done through external lab for IS 10500:2012 compliances.

- Water test report against IS 10500:2012 as per report no. GLARC/WT-2201200103 dated 20.01.2022 from external lab M/s Green Lab Analysis & Research Centre Pvt. Ltd.

Water distribution Plan is updated for water distribution, including holding tanks, water treatment. Pipe coding is observed in the plant.
Water tank cleaning record is evident and frequency is every month. Water distribution Plan is updated for water distribution, including holding tanks, water treatment
Steam is used for drying purpose. It is generated through Boiler & mainly used in column for drying of Paddy. Other gases and compressed air is not used for product contacts or as ingredient.

4.6 Equipment

The processing equipment are made of industry specific material & food contact surfaces from SS-304. The equipment material certificate verified. Other machines available are cleaning machine/MTR, elevator, DE stoner, aspirator, Magnets, Sortex Machine, Metal separator etc. The equipment is positioned to give easy accesses for cleaning, inspection and servicing. All equipment design is as per standard industry practice. Equipment is suitable and designed for the purpose.

4.7 Maintenance

SOP for Machine maintenance- GAFPL/SOP/MNT/01 dated 01.04.2020 is evident. Master list of machines is maintained as- Annex/MNT/01/01.
The Maintenance schedule is divided into parts i.e. Monthly, quarterly, Half yearly & yearly. HACCP checkpoints are also verified on a monthly basis.
An updated preventive maintenance plan is available for year 2021- 22 as- F/GAFPL/MNT/01/01.
Verified Preventive Maintenance/Maintenance History record- F/GAFPL/MNT/01/03. Checked for-

- MTRAs
- Separator Classifiers
- Polishers
- Graders
- Destoners
- Packing Machines
- Sortex

Breakdown Maintenance record is evident as record no. F/GAFPL/MNT/01/04.
Machine hygiene clearance & hand over records are maintained as- F/GAFPL/MNT/02/01.
Food grade lubricants like oil & grease are provided on the basis of risk assessment. Food grade certificate for Grease for Food Grade by M/s NSF for H-1 requirements.

Work shop does not open directly in the production areas & maintained in good conditions.

4.8 Staff facilities

Adequate changing facilities are provided in male & female change rooms before entry to the production areas. There is a double door system before entry to the plant &change room is made before entry to packing hall.

Suitable sized lockers are provided to keep the personal items.

Although, Provision for storage & keeping place for Used & unused protective clothing is not identified or marked in change room. One minor NC was raised against cl. 4.8.3

Hand-wash facilities are provided with liquid soap, Dryers and advisory signs to prompt hand-washing.
Hand wash station tap was automatic.
Separate toilet facilities are provided dedicated for the use by the male & female workers & both these toilets were provided with the proper hand wash facilities.

Factory is declared as no smoking zone. Smoking & tobacco use is not allowed ins-ide the site premises.

Food dining area is provided which is away from packing facility. Tiffin to be kept at separate identified place in dining area near entrance gate.

Eating and drinking is not allowed in processing area or any other area. Catering facility is not provided by the organisation.

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

4.9.1 Chemical control

A chemical control procedure is in place which manages the use, storage and handling of non-food chemicals. List of chemicals is maintained. In total 04 chemicals are in use at site but no one in production or processing.

Strongly scented & taint-forming materials are not allowed. Product is packed only in laminates.

4.9.2 Metal control

Metal control is documented & established as- GAFPL/POL/PRP/02 dated 01.04.2020 is documented. Metal control program is a part of Foreign Object control program. Snap off blades are not in use. Knife & Scissors are provided with control. Staple pins, paper clips and drawing pins are not used or allowed in the packaging or ingredients packaging in the processing areas. Metal detectors are in use & controlled through CCP-02 Plan. Magnets are in use in this facility & controlled through OPRP Plan. Needle change procedure is documented & established for sewing machines. Needle change & verification record is evident as- GAFPL/PRP/08/02.

4.9.3 Glass, brittle plastic, ceramics and similar materials

There is a glass control policy as- GAFPL/POL/PRP/05 dated 01.04.2020. Glass is protected against breakage with shatterproof covers. Glass register available and inspection of all glass. Ref. Glass & Brittle plastic control is a part of Foreign Object control program.

Glass & Brittle materials contamination is controlled by Glass & Brittle material control policy dated 01.04.2020. Documented procedure for handling glass, brittle and hard plastic is in place. Checked Glass control & Hard Plastic for monitoring of glass/clear brittle plastic in production and storage area, monitored on monthly & weekly basis. Glass or brittle plastic materials are not used for packaging. Glass inspection report/Brittle Plastic sheet checklist- GAFPL/PRP/08/01.
Few Glass window are placed in the production and store areas. These are found protected against breakage and numbered in the plant.
The strip lights & other lights are protected with hard plastic shatter proof covers. Tube lights are found protected and numbered in the plant.

4.9.4 Products packed into glass or other brittle containers

NA- Glass or brittle plastic containers are not used for packaging of products.

4.9.5 Wood

Wood policy is documented as- GAFPL/POL/PRP/06 dated 01.04.2020. No unwanted use of wood is allowed in the processing area as per wood policy. Wooden Pallets are treated before taking into production area.

4.9.6 Other physical contaminants

Metal, Glass, Wood & Brittle plastic control is a part of Foreign Object control program- GAFPL/SOP/PRP/08 dated 01.04.2020. The physical sorting, Magnets & Metal detection is done to ensure removal of foreign body from product. Procedures & policies are established for removing physical contaminants at the time of receiving, during process & packing.
Pens are used in process by supervisors only & are metal based so detectable by metal detector in the line.

4.10 Foreign-body detection and removal equipment

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

Foreign Body control & removal system is effective by means of Metal detector, Magnets & Sieves. Policy for Foreign Body control- GAFPL/POL/PRP/06 dated 01.04.2020 are established. SOP for Sieve checking are established dated 01.04.2020. Company does use the SS made sifters, metal detectors and magnets for foreign body detection. Magnets are used at different stages for metal control. Periodic checking records are maintained. This is a part of HACCP study as risk assessment. Justification to be given for any damages, processing equipment. There is continuous visual check for processing and monitoring areas for any possibility of cross contamination. Metal detector controls as per HACCP Plan are established.

4.10.2 Filters and sieves

Sieves conditions are regularly monitored. Product is passed from defined grading sifter type as per production plan. Daily monitoring records are maintained & available.Company does use SS made Sieves in MTRA, sifters, Sizer, Destoner, Whitener, Polishers as evident in approved sieve size for plant machines. Records of operations are maintained. Sieve/Mesh cleaning records was checked, results was OK as verified for month of Nov2021 to Jan2022 as on date.

4.10.3 Metal detectors and X-ray equipment

There is no X-ray Machine. Metal detector is in use & controlled through CCP Plan. Metal detector is provided & declared as CCP. Details of application of CCP decision tree on identified significant hazards were there in place.

- CCP-02: CCP as Online Metal Detection in Finished product, Hazard- Metal hazards. Significant: yes. Critical Limits- Fe: 1.2mm, Non Fe: 1.5mm and SS: 1.8mm. Monitoring plan- 03 times During every shift through Metal test piece. Responsibility- Supervisor/operator. Verification by QA as once

in a day. Corrective action, Verification is defined in CCP Plan. Daily Metal detector sheet- F/GAFPL/CCP/02 is evident. Monitoring record is verified for period Dec21 to Jan22 as on date. There was no deviation observed as per record & staff interviews. Metal detector was checked during on-site production inspection & found working in condition.

The HACCP food safety team had conducted validation for the CCPs & control measures. Verified the CCP Validation Report.

- CCP02: Metal detector- Validation reference: Last done on date 24.08.2021 by Manufacturer. Ref. Taken was FDA Guideline – Compliance policy guides – CPG Sec. 555.425 foods, adulteration. Calibration certificates are given for metal probes test pieces

4.10.4 Magnets

Magnets are in use in this facility & controlled through SOP- SOP/PRD/03 dated 01.04.2020. 04 Magnets are used in the production facility. The magnet strength is to be checked & recorded as Peak gauss. Documented procedure is in place and records are maintained for cleaning, strength, integrity checks. Magnets are in place in processing line. Magnets are also identified as OPRP-02.

OPRP-02: OPRP02 as online 04 Magnets, Hazard- Metal Iron hazards. Significant: Yes. Critical Limits- 10000 gauss minimum. Monitoring plan- Every 12 hours. Responsibility- Supervisor/Operator. Corrective action, Verification is defined in OPRP Plan. Daily Magnet monitoring sheet- F/GAFPL/OPRP/02 is evident. Monitoring record is verified for period Dec21 to Jan22 as on date. There was no deviation observed as per record & staff interviews. Magnets were checked during on-site production inspection & found cleaned in condition. There was no deviation observed as per record & staff interviews. Magnets were checked during on-site production inspection & found cleaned in condition.

4.10.5 Optical sorting equipment

There are colour sortex machines on the site. Sortex is under AMC with manufacturer. These were found working in condition on the dates of audit.

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

NA. Product is not packed in Jars, cans and other rigid containers.

4.11 Housekeeping and hygiene

SOP for General Housekeeping are established. Verified Plant Hygiene SOP no. GAFPL/SOP/PRP/04 & Equipment Hygiene SOP no. GAFPL/SOP/PRP/05 dated 01.04.2020 are established. Documented cleaning procedure is maintained in the Food Safety Procedure manual with frequency of cleaning, items to be cleaned, method of cleaning, cleaning chemicals and checking. Daily Cleaning records are maintained and checked.

Hygiene Audits/Inspections to be carried out on daily basis in respective areas. Verified the GMP checklists and records to be performs on monthly basis. Daily cleaning & Hygiene check records verified as:

- Organization performs Monthly GMP checks as per record- F/GAFPL/MR/07/05. Reports are checked for date01.01.2022.
- Daily General Plant Hygiene cum cleaning record- F/GAFPL/PRP/03/01 & 02 is evident.
- Daily Plant surrounding area cleaning record- F/GAFPL/PRP/03/01 is evident.
- Cleaning of tanks record- F/GAFPL/PRP/03/02.
- Daily Plant cleaning schedule- F/GAFPL/PRP/04/01.
- Daily Plant Equipment cleaning schedule- F/GAFPL/PRP/04/02.
- Daily Plant sanitation checklist- F/GAFPL/PRP/05/02.

- Drains monitoring checklist- F/GAFPL/PRP/05/03.
- Ware House cleaning check record- F/GAFPL/PRP/05/01.
- Daily Personal hygiene check- F/PCLFCL/PRP/02/01.
- Daily Magnet cleaning record- F/GAFPL/OPRP/02.

Limits of acceptable levels of cleaning are defined. Product is under low category risk type.

There is a separate team for cleaning for production & non production areas. Dedicated cleaning machines and tools are provided for production & packaging area. Checking of cleaning performance is responsibility of area supervisor. Result of verification and acceptance are recorded.

Training was given as Personal Hygiene, sanitation & Housekeeping topics on date 08.03.2020 to Workers& Staff member by External Consultant

Documented cleaning procedure is maintained in the Food Safety Procedure manual with frequency of cleaning, items to be cleaned, method of cleaning, cleaning chemicals and checking. Daily Cleaning records are maintained and checked.
Colour coded Equipment are used and labelled. Equipment are suitable for this type of operations. Cleaning chemicals are kept separate in store.

Although, Cleaning tools were not found kept at the identified place. One minor NC was raised against cl. 4.11.6

4.11.7 Cleaning in place (CIP)

NA. CIP system is not available in the production facility for concern facility.

4.11.8 Environmental monitoring

Environment monitoring & swab checks were done on yearly basis from external Lab. Last was done by external laboratory- External Lab M/s Alpha lab & technologies Lab (NABL Accredited).
Although, Monitoring plan for environment monitoring is documented although swab test reports are not available for verification against yearly frequency documented in monitoring plan. One Major NC was raised against cl. 4.11.8.3

4.12 Waste

SOP for Waste control & disposal is established as GAFPL/SOP/PRP/07 dated 01.04.2020. Systems and Procedures are available for waste disposal of waste materials, packaging materials are classified as polythene wastes.

Waste Control contract with M/s Jaswinder Singh dated 01.11.2021 is evident, contract is valid 31.10.2022. Waste is collected & sold to local vendors on day to day basis. Identified waste bins are used for handling waste materials Waste is stored in separate area. Waste containers and area is maintained clean. This is an agricultural product processing unit & waste is sold out to selected persons. Last Waste disposal record is evident through sale slips.

4.13 Management of surplus food and products for animal feed

NA. Organization does not sell its products as Surplus food & animal feed.

4.14 Pest management

Pest control system is found effective in controlling of pest infestation in production areas. SOP for Pest control is documented as SOP/PRP/02 rev 00 dated 01.04.2020. Preventive pest control measures found in place like use of self-closing doors, screening on windows, air curtains etc. Map of The EFK's & Rodent Boxes is evident. Bait stations were found identified and secured at place. Integrated pest control program is documented with details of service, chemical to be used, Area for use, frequency and responsibility. The bait stations were matching with map in actual.
Pest control is outsourced as per Order-cum-Contract of M/s Pest Mortem (India) Private Ltd. for Pest Management Services verified– Contract no. 54 dated 01.01.2022, Period: 01.01.2022 to 31.12.2022. Types of Services: Container fumigation/Loaded Container fumigation/ Cargo Fumigation/ Ware House Fumigation/Timber Treatment/General Insects & Rodent control/Fly Mgt. – Frequency: Alternate day & Fortnightly. Pest control service vendor legal license verified are License no. 928 AMB dated 21.12.2017 Valid up to 31.12.22, registered no. 015/ALP valid up to 29.01.2023. Daily Log sheet is filled for pest inspection. Training record for service persons Mr. Satish Kumar is evident- 17.06.2021.
Service records evident as:

- General Disinfestation service done on Fortnightly basis on dates 07.01.2022 & 21.01.2022.
- Rodent service Fortnightly basis done on Fortnightly basis on dates 07.01.2022 & 21.01.2022.
- Spider control service done on monthly basis & last done on dates 21.01.2022.
- Lizard management service done on monthly basis & last done on dates 21.01.2022.
- Insect catcher cleaning service done on daily basis & last done on dates 07.01.2022 & 21.01.2022.

Survey report is checked for date 01.12.2021. 03 recommendations were issued by service supplier.

Rodent bait stations & Fly catchers Plan is evident. There are Roda boxes- 30 & Fly catcher- 04 in numbers as per plan.
Daily Fly catchers Monitoring/cleaning record- F/GAFPL/PRP/01/07 as per daily frequency.
Although, 01 EFK not found working at the process section. One minor NC was raised against cl. 4.14.6

Pest infestation is checked at the time of receiving and during the production. If this contaminated with pest, the product will be rejected.

Pest control trend analysis record is available for rodent, spider & Lizard control. It is available from Jul21 to Dec21.

4.15 Storage facilities

Procedures for receipt, unloading, storage and handling of incoming material, for transportation of within and outside factory premises are followed for storage of raw material, finished goods, packaging and consumable. Ref. Procedure- GAFPL/SOP/STR/02 dated 01.04.2020.
Work instructions for Paddy storage- SOP/STR/01 dated 01.04.2020 & for Rice storage- SOP/STR/02 dated 01.04.2020 are documented.
There is open outside storage arrangements within the facility for Paddy, process waste & wooden pallets. It is concrete made & tarpaulin are provided for coverage.
Also storages included Raw materials inside Godown. This is well under boundary of the site. Raw material is checked before taking it into facility.
No outside storage practice for In-process or final product in the site.
Temperature control is not required. The raw material & finished products are stored at ambient condition. Controlled atmosphere is not required.
FIFO system implemented. All the raw materials are labelled with receiving date. Production lot numbers are provided and finished products to ensure the FIFO.

Finished goods storages are available for packed product storage. The stock use as per shelf life is followed. The FIFO is monitored through stock monitoring & identification for first use inside the storage area. All the products require ambient storage.
Records checked in traceability exercise on-site.

4.16 Dispatch and transport

Procedure for handling & dispatch of finished products- GAFPL/SOP/STR/02 dated 01.04.2020 is evident. Stickers and labels are properly placed and Loading done at specified place. Handling and dispatch of finished products is followed. Loading advice, container stuffing details, sales orders are maintained. Container is inspected using container check by QC. Proper labelling is to be maintained on the packing.
Checked Vehicle inspection records- F/GAFPL/PRP/01/05 and cover vehicle cleanliness. Temperature control is not required in transit. Contacts with the transporters are available including specified requirements. Transportation service agreement covers these requirements.
Transport, Loading/Unloading contract with External Contractor- M/s Baba Gungala Transport Co., contract is valid till 31.12.2022. Food safety requirements were communicated.

Records maintained as checked for Products:

- for Invoice no. GAF/13/2021-22 dated 07.12.2021 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.12.2021, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. TEMU1452799 dispatched on date 29.12.2021 as per dispatch summary sheet.
- for Invoice no. GAF/64/2021-22 dated 10.11.2021 for Basmati Sella Rice packed in 2538 Master Bags 40lbs, dispatched on date 24.11.2021, total quantity sent was 46.00MT, dispatched to customer in USA, In containers no. TEMU1974875, HLXU3103745 dispatched on date 24.11.2021 as per dispatch summary sheet.

Records are maintained.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
4.3.5	No Temporary structures observed in the premises during the course of Audit.
4.4.6	No elevated walkways are provided in the processing facility.
4.5.3	Other gases, steam and compressed air are not used for product contacts or as ingredient.
4.8.6	Factory is declared as no smoking zone.
4.9.1.2	Strongly scented & taint-forming materials are not allowed in the production areas.
4.9.2.2	Staple pins, paper clips and drawing pins are not used or allowed in the packaging or ingredients packaging in the processing areas

4.9.4	Glass or brittle plastic containers are not used for packaging of products.
4.10.6	Product is not packed in Jars, cans and other rigid containers.
4.11.7	CIP system is not provided in the production facility as per processing system & requirements.
4.12.3	There is no such third party contract system by the site.
4.13	Management of surplus food and products for animal feed
4.14.3	Pest control services are outsourced from external agency.
4.15.3	Temperature control is not required. The raw material & finished products are stored at ambient condition
4.15.4	Controlled atmosphere is not required. The raw material & finished products are stored at ambient condition.
4.16.3	Temperature control is not required.

5. Product control

5.1 Product design/development

Product design and development primarily focuses on replication of same product as per customer orders & specifications. Potential risks and hazards are adequately addressed. There is no Glass, brittle packaging in the product. HACCP-based study is done as a part of the product design and development process. HACCP team leader is responsible to control of changes in HACCP system. Safety of the product is established by testing the products. Hazard analysis is conducted for all the process steps and products to ensure manufacturing of safe products. Shelf life trials are conducted and records are maintained. Shelf life is established based on tests, industry norms and codes of practices for food safety. Scope of Product development is primarily restricted to developing/ replicating samples as per customer requirement. During the process of trials the company ensures that the manufacturing processes are capable of producing a safe and legal product.
SOP for Shelf Life study is documented as- F/GAFPL/QA/06/01. The shelf life trials are done in house. The samples are kept for given shelf life and analysis is carried out at predetermine frequency.
Shelf-life plan is evident: F/GAFPL/QA/06/01.

- Completed shelf life checked from External lab M/s Green Lab Analysis & Research Centre Pvt. Ltd. shelf life test report is evident as per test report no. GLARC/FA-1902150101 dated

15.01.2021. Sample of rice batch no. GSF-0339 was kept on date 15.01.2019 & last checked on date 15.01.2021.
- On-going shelf life sample is kept & checked for Invoice no. GAF/01/2020-21 dated 20.11.2020 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.11.2020, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. BMOU2840650 dispatched on date 29.11.2020 as per dispatch summary sheet.

5.2 Product labelling

SOP for Labelling & Pack control is established as Packing & dispatch of Finished Goods. Labelling information is provided by customers only. Labelling of the products is as per the legislative requirement and as per the customer guidelines. Labelling is followed as per local regulatory requirements and or customer requirements. No such claim is made to satisfy a consumer group. There is no allergen in the finished products as verified from ingredient list in labelling. Packaging material is checked by QC for labelling approval. No such product claims are made to satisfy a consumer group by the organization. Label checking is done by production & QC dept. both & final approval is given by QC dept. for product release. On-site label checks are performed as a part of production records.
No such product claims are made to satisfy a consumer group by the organization.
SOP for labelling control is evident as- GAFPL/SOP/QA/07 dated 01.04.2020. There is a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines. It is controlled by Store issuance, Production monitoring by supervisors, QC lab & On-line QC team. Packaging material is approved by QC & then issued for production on daily basis.
Label/Printed bag control plan & checklist is evident as record. It covers Bag verification, Label verification & Printed information checks.
Organization is not producing ready-to-eat product.

5.3 Management of allergens

This Site does not handle any allergen. Allergen policy- GAFPL/PRP/POL/05 dated 01.04.2020. Product does not contain any allergen given in the list of BRC glossary. Allergen risk assessment is conducted & recorded by the organization dated 01.04.2020. Final Products including raw material is assessed and found free from allergen. Training is given to all employees for Allergen control requirements & cross contaminations. Allergen awareness training was given to all FST members & all staff by External faculty.

5.4 Product authenticity, claims and chain of custody

The organization has done vulnerability risk assessment in VACCP- Annexure-N dated 01.04.2020. Vulnerability risk assessment is done based on likely hood of occurrence and likelihood of detection in the scale of 1 to 5.
Following risk method is adopted for likely hood of occurrence- Very likely/Certain – 5, Likely - 4, Fairly Likely – 3, Unlikely – 2, and Very Unlikely- 1.
And likelihood of Detection/Control E.g. Very likely/Certain – 5, Likely - 4, Fairly Likely – 3, Unlikely – 2, and Very Unlikely- 1.
Risk rating is divided as <=6 then VACCP plan is required for raw material. Risk assessment is done for all raw materials i.e. Paddy & Rice. Last review done on 01.04.2021.
No such claims are made by the organization.

Raw material risk analysis is evident as- Hazard analysis Annexure-E Doc. no. GAFPL/SOP/MR/08 & VACCP Annexure-N dated 01.04.2020. Organization is into this business from long time. Basically it is a typical agriculture-based industry & raw material is Paddy, raw rice & type of packaging materials. Organization purchase Paddy & Rice both as per year planning. Raw materials are purchased from Local Bulk commodity centres & also from Traders & Brokers as per requirements. Rice & primary packaging

material is considered as High risk material. During interview with management & purchase staff, it was checked that No such substitution or adulteration/fraud issue was observed by the Senior management in recent years. Raw material samples are checked by responsible purchase inspector & QC Manager before purchase & only passed RM to be purchased as per instructions.
Risk assessment covered- Allergen contamination, Foreign body, Microbiological contamination, Chemical contamination, Substitution or Fraud, Radiation. Allergen assessment is performed as per BRC allergic substance requirements. There is no allergen in Raw materials & finished products.
SOP for Purchase is evident as- GAFPL/SOP/PUR/01 dated 01.04.2020. Purchase is mainly controlled by GM. Documented supplier assessment, selection, approved criteria is documented. Supplier selection based on Past experience, Evaluation & review of supplier questionnaire, sample approval, market reputation, GFSI scheme certification etc.

Organization does not claim for provenance, assured or 'identity preserved' status of raw materials used. Site does not claim for HALAL or Organic.

5.5 Product packaging

Packaging material specifications are documented & provided to the suppliers. Food grade certificates for primary packaging material are evident. Product packed in Laminated Poly Pouches, BOPP bags, Non-woven bags, Jute Bags. Whenever packaging is received, it is checked by QC for conformance to specifications.
PM material: Incoming PM check record- F/GAFPL/STR/01/06 is checked.

- Checked for PP bags received from M/s Lizza Ram Fabricators against bill no. LRF-1056 dated 19.11.2021. Total In-house Lab inspection report is evident. Total quantity received- 5100Pcs. Food grade certificate & COA is provided by vendor dated 18.11.2021.
- M/s A-One Tex Tech Pvt. Ltd. for Laminate Pouches. Food grade certificate & COA is provided by vendor.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

SOP for Quality Control is documented as-GAFPL/SOP/QA/01 dated 01.04.2020. Standard Test Procedures/Methods for inspection and testing are documented. Ref standards was available there. Inspection and testing are performed at receiving of raw material; during in-process and final packed of the product.
In-house laboratories are provided for the regular Raw material and FG product testing except microbiology testing facility. This includes In-process test laboratory for online product checking also. Product is long shelf life product.
External NABL approved labs are used for testing and calibration which are not performed internally.
Raw material acceptance & monitoring plan is documented & established as- GAFPL/SOP/QA/01 for year 2021- 22. Raw material is also get checked from external laboratories if required by customers or by QC dept. Packaging material is accepted on the basis of test reports/COA from Vendors. Inspection & testing plan is evident from In-house lab.
In general, First step is sample approval for trading parties in case of rice purchase & then order is given to them.
In case of Paddy first initial sample to be checked in in-house lab & then unloading is allowed as per plan.
Later second inspections is also performed at the time of incoming material. In case of Paddy purchase, First pre unloading samples & then composite Post unloading samples were checked for final acceptance.

Records Checked for RM (Inspection & Analysis report of Paddy/Rice): Record no. F/GAFPL/QA/01/01 for Paddy & F/GAFPL/QA/01/05 for Raw rice:

- Rice received from M/s Bhardwaj Overseas Private Ltd. against invoice no. SB-436 dated 18.11.2021. Total quantity received was 30MT on date 18.11.2021 as per GRN no. 3305. Incoming Check record for Rice dated 18.11.2021 is evident. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.
- Rice received from M/s B.D. Enterprises against invoice no. 6447 dated 28.06.2021. Total quantity received was 25.025MT on date 28.06.2021 as per GRN no. 376. Incoming Check record for Rice dated 17.10.2020 is evident. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.
- Paddy was not purchased in year 2022. Small amount is purchased in year 2021.& received from Local domestic Mandi (BCC). Checked for Paddy received from Broker M/s Kartar Singh & Sons (Local Samalkha mandi- BCC) against bill no. BS-68 date 06.11.2020. Paddy was received on date 06.11.2020. GRN gate pass no. 387 dated 06.11.2020, Total quantity received was- 703 bags (35.20MT). Incoming Check record for Paddy dated 06.11.2020. Lot stack number given was- 01. It was checked for Moisture%, Admixture%, Whiteness, Length, Brocken%, Points/100gm, Clipping, Damaged & Discoloured Grain%, Red Stripped, Paddy Grains, Black Grains, Cooking results, Other Foreign Matter. RM was accepted by QC.

PM material: Incoming PM check record- F/GAFPL/STR/01/06 is checked.

- Checked for PP bags received from M/s Lizza Ram Fabricators against bill no. LRF-1056 dated 19.11.2021. Total In-house Lab inspection report is evident. Total quantity received- 5100Pcs. Food grade certificate & COA is provided by vendor dated 18.11.2021.
- M/s A-One Tex Tech Pvt. Ltd. for Laminate Pouches. Food grade certificate & COA is provided by vendor.

External Lab test reports (NABL approved):

- Checked for External lab M/s Green Lab Analysis & Research Centre Pvt. Ltd. test report no. GLARC/FA-2201200107 dated 21.01.2021 for Milled Basmati Rice. Parameters as given in FSSR: 2011 & includes Physio-chemical, Toxic substances, Heavy Metals, Pesticides residues and microbiological testing including pathogens.

Water Quality: Water test report against IS 10500:2012 dated 23.05.2019 as per report no. GLARC/WT-2201200103 dated21.01.2022 from external lab M/s Green Lab Analysis & Research Centre Pvt. Ltd.

The HACCP food safety team has conducted validation & shelf life studies for the products. The shelf life trials are done in house& from external Lab. The samples are kept for given shelf life and analysis is carried out at predetermine frequency. On-going Shelf-life plan is evident: F/GAFPL/QA/06/01.

- Completed shelf life checked from External lab M/s Green Lab Analysis & Research Centre Pvt. Ltd. shelf life test report is evident as per test report no. GLARC/FA-1902150101 dated 15.01.2021. Sample of rice batch no. GSF-0339 was kept on date 15.01.2019 & last checked on date 15.01.2021.
- On-going shelf life sample is kept & checked for Invoice no. GAF/01/2020-21 dated 20.11.2020 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.11.2020, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. BMOU2840650 dispatched on date 29.11.2020 as per dispatch summary sheet.

RO water test report is evident. Water testing was done through external lab for IS 10500:2012 compliances. Water testing is annually.
GLARC/WT-2201200103 dated21.01.2022 from external lab M/s Green Lab Analysis & Research Centre Pvt. Ltd

SOP for Shelf Life study is documented as- F/GAFPL/QA/06/01. The shelf life trials are done in house. The samples are kept for given shelf life and analysis is carried out at predetermine frequency.
Shelf-life plan is evident: F/GAFPL/QA/06/01.

- Completed shelf life checked from External lab M/s Green Lab Analysis & Research Centre Pvt. Ltd. shelf life test report is evident as per test report no. GLARC/FA-1902150101 dated 15.01.2021. Sample of rice batch no. GSF-0339 was kept on date 15.01.2019 & last checked on date 15.01.2021.
- On-going shelf life sample is kept & checked for Invoice no. GAF/01/2020-21 dated 20.11.2020 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.11.2020, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. BMOU2840650 dispatched on date 29.11.2020 as per dispatch summary sheet.

5.6.2 Laboratory testing

In-house laboratories are provided for the regular Raw material and FG product testing for Physical inspections, moisture, whiteness/colour, grading, dimensions checks, Foreign material, unwanted grain like chalky, broken immature grains.
There is no typical chemical or microbiology test facility at this site & these testing to be done by external approved labs only. This includes In-process test laboratory for online product checking also. Product is long shelf life product. Lab is fully segregated from the production & storage areas. Drainage opens outside to the processing plant.
SOP for Quality Control is documented as- GAFPL/SOP/QA/01 dated 01.04.2020. Standard Test Procedures/Methods for inspection and testing are documented. Ref. standards was available there. Inspection and testing are performed at receiving of raw material; during in-process and final packed of the product.
NABL approved labs are used for testing and calibration which are not performed internally like Microbiology testing.
Proficiency testing was done as per customer requirements.
The analyses conducted in house are based on recognised standard. Results are compared with external lab test results for calibrations.
Calibrated certificates are verified for Lab equipment and are evident.

5.7 Product release

SOP for Product release is documented GAFPL/SOP/QA/01 dated 01.04.2020. Verified for Finished product verification & positive release record are evident. General checklist for Export/Domestic packing is maintained which includes Party name, Brand name, packing size, type of packing, stitching check, pouch sealing, drop test, gross weight, net weight, batch number, packing date, best before. Finished Product analysis & release report no. F/GAFPL/QA/01/07 is evident.
Records maintained as checked for Products:

- for Invoice no. GAF/13/2021-22 dated 07.12.2021 for Basmati Sella Rice packed in 1269 Master Bags 40lbs, dispatched on date 29.12.2021, total quantity sent was 23.00MT, dispatched to customer in USA, In containers no. TEMU1452799 dispatched on date 29.12.2021 as per dispatch summary sheet.
- for Invoice no. GAF/64/2021-22 dated 10.11.2021 for Basmati Sella Rice packed in 2538 Master Bags 40lbs, dispatched on date 24.11.2021, total quantity sent was 46.00MT, dispatched to customer in USA, In containers no. TEMU1974875, HLXU3103745 dispatched on date 24.11.2021 as per dispatch summary sheet.

5.8 Pet Food

NA, Organization is not producing food for pet.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.2.3	No such product claims are made by the organization.
5.2.5	Organization is not producing ready-to-eat product.
5.3.2 to 5.3.8	There is no allergen handled at this site.
5.4.4	Organization do not claim for provenance, assured or 'identity preserved' status of raw materials used.
5.8	Organization is not producing food for pet

6. Process control

6.1 Control of operations

SOP for Production is established dated 01.04.2020. Process is semi- automatic as system is provided for processing. Documented procedures and work instructions are documented & established accordingly that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan. Temperature and pressure control equipment are provided. Complete process is controlled through operation control procedures. On-line monitoring of equipment is designed with failure alert system. Critical equipment is controlled through control points and critical control points. Validation studies are performed for CCP. Sieving through Sifters & Metal separation through magnets & Metal detectors is provided. The company has controls over process operations. This is achieved from the long-time experience of production, experienced personnel, equipment installed, industry specific machinery and clearly documented procedures/ work instructions. Effective monitoring of all process parameters is demonstrated by record keeping and consistent product quality. Daily processing record as Batch manufacturing report with full Gain/Loss report sheet available. Log sheets are maintained. SOPs & Work instructions are developed & established for control of operations. These are checked & found implemented.
Process control checked during on-site audit & traceability exercises.

6.2 Labelling and pack control

SOP for Labelling & packing control is documented as- GAFPL/SOP/QA/07 dated 01.04.2020. There is a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines. It is controlled by Senior Management, QC Lab Manager& Production Manager. Packaging material is approved by QC & then issued for production on daily basis.
General checklist for Export/Domestic packaging is maintained which includes Party name, Brand name, packing size, type of packing, gross weight, net weight, batch number, packing date and best before. Bag sample is checked & recorded by QC lab person as checklist for packing plant- F/GAFPL/QA/01/08.
Product is to be released by FSTL/QC Lab as per record- F/GAFPL/QA/01/07.
Daily Line clearance checks are performed by QC dept. Daily Cleaning records are maintained and checked. Cleaning performance is checked before starting production in each shift by supervisor and verified by QA Manager.

- Daily General Plant Hygiene cum cleaning record- F/GAFPL/PRP/03/01 & 02 is evident.
- Daily Plant cleaning schedule- F/GAFPL/PRP/04/01.
- Daily Plant Equipment cleaning schedule- F/GAFPL/PRP/04/02.
- Daily Plant sanitation checklist- F/GAFPL/PRP/05/02.
- Ware House cleaning check record- F/GAFPL/PRP/05/01.
- Daily Personal hygiene check- F/PCLFCL/PRP/02/01.
- Daily Magnet cleaning record- F/GAFPL/OPRP/02

6.3 Quantity, weight, volume and number control

Online checks for quantity verification including weight and grade checks are conducted as per the documented procedures, regulatory and customer's requirements. Weight checks are performed for each and every bag as per work instruction. The details are evident in Batch manufacturing report for each stage. Process monitoring record is evident & checked. All bags are checked for Quantity weight & numbered. General checklist for weight check for bulk packs is maintained which includes Party name, Brand name, packing size, type of packing. Each bulk bags is checked & recorded by Production person.
Product is released by QC Lab. Legislative requirements and customer requirements apply. Online checks for quantity verification including weight and grade checks are conducted at as per the documented procedures, regulatory and customer's requirements.

Legal metrology was done by State Govt. Weight & Measure Dept. metrology on date 08.12.2021 for 06 Weighing scales & 01 weigh bridge is evident & valid for 01 year. Certificates are available for all weighing scales as per records.

6.4 Calibration and control of measuring and monitoring devices

SOP for Control of Measuring equipment is documented as GAFPL/SOP/PRP/06 dated 01.04.2020. The company has identified equipment used to monitor critical control points. Calibration to recognised national standard is evident. Calibration plan & records verified. Calibration schedule for Plant equipment and Lab equipment is maintained. Calibration Frequency: Externally- 01 Years. Calibration done by an NABL approved Lab. List of Calibration status is maintained.
Calibration certificates were checked as:

- Also, Calibration certificate for RTD provided in Dryer is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00965F are evident. It was done on 13.01.2022 & due on date 12.01.2023.
- Calibration certificate for Moisture Meter is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/220113.4.1 are evident. It was done on 13.01.2022 & due on date 12.01.2023.

- CCP02: Metal detector- Validation reference: Last done on date 24.08.2021 by Manufacturer. Ref. Taken was FDA Guideline – Compliance policy guides – CPG Sec. 555.425 foods, adulteration. Calibration certificates are given for metal probes test pieces.
- Calibration certificate for Vernier Calliper is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00990 are evident. It was done on 14.01.2022 & due on date 13.01.2023.
- Calibration certificate for Pressure Gauges provided in Boiler is evident from External lab M/s A A Calibration Pvt. Ltd. certificate no. AACPL/00966F & AACPL/00967F are evident. It was done on 13.01.2022 & due on date 12.01.2023.
- State Govt. Weight & Measure Dept. metrology on date 08.12.2021 for 06 Weighing scales & 01 weigh bridge is evident.

Regular verification is performed for all critical equipment as a part of based monitoring of equipment. Ref. Thermometer & weighing scales monitoring record.
Master equipments are traceable to national standard as per certificates.
All the errors in the above certificates were within the specified limits. All calibrations were traceable to national standard and master equipment.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.2.4	On-line vision type of equipment for label & print check is not provided by the site at present.

7. Personnel

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

SOP for training and development is followed- GAFPL/SOP/HR/01 dated 01.04.2020. SOP for recruitment including induction is also available. A minimum competence criterion is available. Responsibility& authority matrix is evident.

Job specifications & descriptions are defined in the Annexure- GAFPL/SOP/HR/02 dated 01.04.2020. Verified R & A for MD, Director, QC Head, Production Head, Stores cum Despatch in-charge, FSTL, IPQC etc.

Competency matrix- F/GAFPL/HR/01/11 is evident dated 01.04.2020 for all employees.
Authority Absence arrangements are done & recorded in the documents. Employees are found aware of their responsibilities.

Training need is identified for planning through competency matrix defined for each job position. Last done on date 01.04.21.
Temporary staffs are given verbal briefing before commencement work, adequate supervision was evident.
The annual training calendar is available for year 2021-22 as per Document No. F/GAFPL/HR/01/04. Total 15 training are planned for year 2021- 22.
Training attendance cum record is evident. Training feedback form is evident. Training was given by external faculty. Ref. Record- Attendance sheet- F/GAFPL/HR/01/06 & Training feedback & effectiveness check- F/GAFPL/HR/01/08 & 09.

- BRC/HACCP awareness training was given on date 01.10.2021 by external trainer to persons for 06 hours.
- CCP/OPRP training was given on date 08.11.2021 by external trainer for 02.30 hours.
- Last Internal auditors training was given on date 07.10.2021 by external consultant dated 3.30 hours.
- GMP/GHP/Pest Control/Personal Hygiene training was given on date 16.10.2021 by external trainer for 04 hours.
- Allergen awareness training was given on date 11.01.2022 by external trainer for duration 02 hours.
- Food safety & quality culture plan & confidential reporting system training was given to all employees on date 25.10.2021 by external trainer for duration 02 hours.

Training feedback & effectiveness check for given trainings. It is done by oral & written examination. Individual training record is maintained as- F/GAFPL/HR/01/07.
Existing employees receive trainings once per year.
Refresher trainings for permanent workers once/Year.

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

The SOP for the personnel hygiene is documented as Doc. No. GAFPL/SOP/PRP/02 dated 01.04.2020. Documented personnel standards exists and communicated to all the employees. Personal hygiene policies, hand washing procedure, Do and Don'ts are documented and displayed at relevant locations including change room. Beaded jewellery, Watches and other loose jewelleries are not permitted in the production areas. Fingernails are trimmed properly and are found to be cleaned. This is also verified by the dedicated security guard before allowing personnel in the production area. False fingernails are not permitted. Perfume or aftershave is not permitted.
Hand cleaning is performed before entry to the production area with sanitization and periodic sanitation is in practice for workers in packaging area by using alcohol based sanitizer at a fixed frequency.
If people are found to have cuts and wounds, they are not allowed to enter the production area and are sent back. It is covered in checklist for personnel movement. There is no use of blue colour metal plaster. Only Low risk areas are identified on the basis of risk analysis. There is no high care or high risk area in the facility.

Sanitation & Housekeeping/Personal Hygiene training was given on date 16.10.2021 by external trainer for 03 hours.

Compliances checked. The hand washing is in place. The protective clothing is in place. Protective clothing includes aprons, caps, mask & shoe change. The jewellery control is found in place. The drinking and eating is permitted in the designated location and found in place. Lockers are provided to keep personal belongings.

The daily monitoring of personal hygiene & sanitation is done& recorded. Records are maintained & verified by QC Person as- F/GAFPL/PRP/02/01.

Although, 02 workers were observed with restricted items in hygiene policy i.e. threads & watch in production area. One minor NC was raised against cl. 7.2.1

7.3 Medical screening

Worker medical screening is performed on annual basis. Medical screening records are evident. A procedure which enables notification by employees, including temporary employees, of any relevant infection, disease or condition with which they may have been in contact or be suffering from is documented. Last medical screening was done on date 25.01.2021 done by M/s Sh. Moolchand Kidney Hospital. Verified for Production workers & found were evident.
Records checked for Mr. Mithlesh (QC In-charge), Mr. Hitesh (Export), Mr. Sunil, Mr. Rinku, Mr. Rajbir, Mr. Subhash Chand& Mr. Mukesh Kumar. Vaccination is done on the same date of medical screening for Hepatitis A, Typhoid & Tetanus.
Visitor Policy is in place as- F/GAFPL/PRP/02/03. All the visitors and contractors are required to complete a health questionnaire prior to entering the production areas- F/GAFPL/PRP/02/02.

7.4 Protective clothing: employees or visitors to production areas

Company provides protective work wears to all the employees including visitors and contractors. Documented uniform policy exists. Aprons, disposable cap, mouth mask are provided by company for the employees entering in the production area as appropriate. The rules regarding the wearing of protective clothing in specified work areas are displayed at entry gate. Caps, Apron and masks are provided to visitors. Beard snoods are provided to visitors.
Organization provides laundry facility from external laundry agency- Gulshan Drycleaner Dry Cleaners. Contract date 01.04.2021 to 31.03.2022. Laundry audit report form is evident.
External lab M/s Green Lab Analysis & Research Centre Pvt. Ltd. swab sample test reports- Uniform
There is no high care and high risk area identified in the processing unit on the basis of risk analysis.
Personal protective clothing that are not suitable for laundering are provided for Use & throw type only.
Daily shift wise protective clothing is being changed.
Gloves are not provided & not in use.

Personal protective clothing that are not suitable for laundering are provided for Use & throw type only.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
7.2.3	If people are found to have cuts and wounds, they are not allowed to enter the production area as per written and displayed instructions. There is no use of blue colour metal plaster.

7.2.4	Plaster containing metal is not in use. Company does not allow any personnel with cuts and wounds in the processing area.
7.2.5	Other than company own medical services there is no permission to use of the personnel medicines.
7.4.5	Gloves are not provided & not in use.
7.4.6	Personal protective clothing that are not suitable for laundering are provided for Use & throw type only.

Template control	Food	**Version**	1.0

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

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

Cl. 8.0	NA. There is no high care, ambient high care or high risk area identified in the processing unit. Only Low & enclosed areas are found on the basis of product Varity & processing activities in the plant. Products are agro based commodity and self-stable at ambient conditions

9 - Traded Products

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

Not applicable

9.2 Specifications

Not applicable

9.3 Product inspection and laboratory testing

Not applicable

9.4 Product legality

Not applicable

9.5 Traceability

Not applicable

Module 11: Meat supply chain assurance

Scope	Click or tap here to enter text.

11.1 Traceability

Click or tap here to enter text.

11.2 Approval of meat supply chain

Click or tap here to enter text.

11.3 Raw material receipt and inspection

Click or tap here to enter text.
11.4 Management of cross-contamination between species
Click or tap here to enter text.
11.5 Product testing
Click or tap here to enter text.
11.6 Training
Click or tap here to enter text.

Module 12: AOECS Gluten-free Foods	
Scope	Click or tap here to enter text.
12.1 Senior management	
Click or tap here to enter text.	
12.2 Management of suppliers of raw materials and packaging	
Click or tap here to enter text.	
12.3 Outsourced production	
Click or tap here to enter text.	
12.4 Specifications	
Click or tap here to enter text.	

12.5 Management of gluten cross-contamination
Click or tap here to enter text.
12.6 Management of incidents, product withdrawal and product recall
Click or tap here to enter text.
12.7 Labelling
Click or tap here to enter text.
12.8 Product inspection and laboratory testing
Click or tap here to enter text.

Additional Specifier requirements

14.1 Traceability
Click or tap here to enter text.
14.2 Finished goods microbial test and hold program
Click or tap here to enter text.
14.3 Gloves
Click or tap here to enter text.

Module 13 FSMA Preventive Controls Preparedness Module Version 2 July 2018			
Clause	Module item	Conforms Y/N	Comments
13.1.1	Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting.		
13.1.2	Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.		
13.1.3	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.		
13.1.4	Ice used in contact with food must be		

	manufactured in accordance with Good Manufacturing Practice (GMP) requirements of 21 CFR 117.		
13.1.5	Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.		
13.1.6	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological hazards • Unintentional adulterants		

	which affect food safety		
13.1.7	All identified known or reasonably foreseeable hazards must be evaluated to determine "hazards requiring a preventive control" (i.e., significant hazards).		
13.1.8	Establish one or more preventive control(s) for each identified "hazard requiring a preventive control" (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.		
13.1.9	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify		

	recall is carried out • Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product		
13.1.10	Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRC section 2.10.		
13.1.11	Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRC sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).		
13.1.12	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-		

	chain controls as appropriate to the nature of the hazard, control and facility.		
13.1.13	The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification. The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.		
13.1.14	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Sampling procedure to include method, quantity, frequency, and number of samples • Analytical method • Laboratory conducting analysis		

	• Corrective action procedure where pathogen is detected		
13.1.15	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Adequate number and location of sample sites • Timing and frequency of sampling • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected		
13.1.16	Devices used to verify preventive controls must be calibrated.		
13.1.17	Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training and		

	qualification via job experience.		
13.1.18	All records required by 21 CFR § 117 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable		
13.1.19	The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.		
13.1.20	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food		

	safety plan, which must remain onsite.		
13.1.21	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.		
13.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.		
13.1.23	One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter at an adequate frequency.		

13.2.1	Human food by-products held for distribution as animal food must be held under conditions that will protect against contamination, including the following: - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with a third party to transport the human food by-products for use as animal food.		

13.3.1	A Qualified Individual (QI) is responsible for developing the site's food defense plan, conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on the site's organizational chart. One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.		
13.3.2	The site shall have a written food defense plan, which includes the following: • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification		
13.3.3	A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates		

	the following key criteria (at a minimum): • Scale and severity of threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including consideration of an inside attacker A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each point, step or procedure in the operation was or was not identified as an actionable process step.		
13.3.4	Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment. Justification shall be documented explaining		

	how the strategy significantly minimizes or prevents the vulnerability.		
13.3.5	Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies. Procedures shall include recordkeeping requirements for all monitoring activities.		
13.3.6	Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria: • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions		
13.3.7	Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to		

	procedures. Verification procedures shall describe activities to verify implementation of mitigation strategies. Verification procedures shall include: • A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days) • Other verification activities as appropriate (e.g., internal audit) • Method for verifying that reanalysis of the food defense plan was conducted • Frequency for verification activities • Recordkeeping requirements of all verification activities		
13.3.8	Reanalysis of the food defense plan shall be documented and performed every three years or whenever • A change in facility operations which creates a new significant vulnerability		

	• Knowledge about a new threat applicable to the food or facility becomes known • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence		
13.3.9	All records required by 21 CFR § 121 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable		
13.3.10	The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any		

	changes following reanalysis.		
13.3.11	All documents and records relating to the food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite.		
13.4.1	Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used. A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.		

13.4.2	The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule. Responsibilities shall ensure transportation operations are conducted in a manner to prevent food from becoming unsafe during transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.		
13.4.3	Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier. Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the		

	shipper documents sanitary specifications of vehicles for the loader and carrier, which are appropriate for the type of food.		
13.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary specifications provided by shipper.		
13.4.5	Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse.		
13.4.6	Contracts with carriers shall specify that the carrier is responsible for the following sanitary activities where agreed to in writing with shipper. • Sanitary condition of vehicles and transportation equipment • Following shipper's sanitary specifications (including pre-cooling requirements where applicable) • Recording compliance with operating temperature where critical to food safety		

	• Procedures for the use of bulk vehicles, which includes recording the previous cargo and most recent cleaning for the shipper		
13.4.7	Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers • Awareness of potential food safety problems that may occur during food transportation • Basic sanitary transportation practices to address those potential problems • Responsibilities of the carrier		
13.4.8	The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours.	NA	
13.4.9	The recordkeeping policy shall ensure all sanitary design requirements and	NA	

	cleaning procedures for vehicles are maintained onsite and all offsite records are retrievable within 24 hours.		
13.5.1	Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: • Principles of food hygiene and food safety Produce safety standards applicable to an individual's job	NA	
13.5.2	Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following: • Recognizing produce contaminated with known or reasonably foreseeable hazards • Inspecting harvest containers and equipment to ensure that they are clean, maintained and do not contaminate produce with hazards • Correcting problems with	NA	

	harvest containers or equipment		
13.5.3	One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.	NA	
13.5.4	A supervisor shall be identified with responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart.	NA	
13.5.5	Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals.	NA	
13.5.6	The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to prevent the system from being a source of contamination to produce and food	NA	

	contact surfaces. The system shall be inspected for conditions, which could introduce known or foreseeable hazards into or onto produce. Where testing of the water source or system inspection reveals contamination, deficiencies shall be corrected such as the repair of well caps or sanitary seals.		
13.5.7	Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL.	NA	
13.5.8	Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL.	NA	
13.5.9	Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria. Where water treatment is not performed, re-	NA	

	inspection of the entire affected agricultural water system shall be conducted followed by the identification of conditions leading to the introduction of hazards into or onto produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.		
13.5.10	Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency (EPA), ‘‘Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA–821–R–09–007),’’ December, 2009 or equivalent method.	NA	
13.5.11	During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include	NA	

	establishing and following a water-change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize infiltration of pathogens into produce.		
13.5.12	Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed.	NA	
13.5.13	Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces.	NA	
13.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.	NA	
13.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe	NA	

	after being made by the supervisor or responsible party.		
13.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours. Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.	NA	
13.5.17	Specific additional requirements for the harvesting, packing, and holding of sprouts. Establish and implement a written Environmental Monitoring plan for the testing of Listeria spp or Listeria monocytogenes. The environmental monitoring plan shall include the following criteria: • Target test (i.e., Listeria spp. or L. mono) • Sample frequency (no less monthly)	NA	

	• Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) The plan shall describe aseptic methods for sample collection and testing according to FDA's "Testing Methodology for Listeria species or L. monocytogenes in Environmental Samples," Version 1, October 2015 (or equivalent).		
13.5.18	Specific additional requirements for the harvesting, packing, and holding of sprouts. The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono. If Listeria spp. or L mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of	NA	

	the corrective action process: • Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of Listeria spp. or L. mono • Conduct finished product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce		

AUDIT PLAN NEXT VISIT Please note that changes to Auditors may be unavoidable due to operational requirements				
Lead Auditor	Dhrunad Danak	Additional Auditors (Expert)		-
Standard(s)	BRC Global Standard for Food Safety Issue 8.0		Audit Language (if not English)	Hindi, English
Audit Dates	27th & 28th Feb 2023	Location(s)	Nadana Road, Taraori, Karnal, Haryana –132 116, India	
Audit Start Time	09.00	Does Client need to confirm site visit with ISOQAR Head Office prior to next visit **YES/NO**		
Type of Audit	BRC Recertification	Is Recertification Planning Required **YES/NO**		

Date	Time (or AM/PM)	Area/Department/Functions/Process/Aspects/Activities	Auditor
Day1	09.00	Opening Meeting including review of previous visit.	DD
	09.30	Top Management (commitment, continual improvement, organisation structure, responsibility and authority)	DD
	11.30	Hazard Analysis system (HACCP)/HACCP team/Quality Assurance (HACCP Study including hazard analysis of PRP's)	DD
	14.00	Lunch	DD
	14.30	Production Facility Audit. Site Standards (Premises, security, lay out, building, utility, equipment and maintenance, staff facility, chemical & physical contamination, foreign body detection, House keeping and hygiene waste disposal, pest control, storage, dispatch & transport)	DD
	18.15-18.30	Day Briefing	DD
		Day 2	
Day 2	09.00	Production Facility Audit. Site Standards (Premises, security, lay out, building, utility, equipment and maintenance, staff facility, chemical & physical contamination, foreign body	DD

		detection, House keeping and hygiene waste disposal, pest control, storage, dispatch & transport)	
	11.00	Food Safety & Quality Management System (Manual, Document & Record control, internal audit, supplier approval, specification, Maintenance, corrective action control of non-conformity, traceability challange, complaints handling, incident, withdrawal & recall)	DD
	14.00	Lunch	DD
	14.30	Product/Process Control (Product development, allergens, special status products, packaging, lab testing, product release, Process control, Packing Control, Weight Control, Calibration)	DD
	16.30	Personnel (Training, medical screening, grooming and personal hygiene)	DD
	17.30	Report preparation	DD
	18.00-18.30	Closing meeting	DD

Documents that will be required by the auditor

- Quality/Food Safety Manual, policies, procedure & work instructions as applicable and relating to pre-requisites
- Quality & Food Safety Policy
- Company Organisation Chart
- HACCP Studies and records of verification
- Microbiological and Chemical Analysis Records
- Records supporting product compliance and suitability for food
- Management review minutes
- Training records
- Internal audit plan, records and evidence of auditor training
- Traceability and product recall test records and records of any actual product recalls
- Supplier approval & monitoring records
- Results of any product analysis
- Cleaning schedules and cleaning records
- Instances of any foreign-body contamination
- Records of receipt and investigation of customer complaints
- Pest control reports, contract and baiting plan
- Maintenance and engineering records
- Records for control of glass and brittle plastics
- Records for control of blades and sharp objects
- Non-conforming goods records
- Calibration records
- Specifications for Raw materials and finished products
- Chemicals including cleaning materials, lubricants and adhesives specifications/data sheets
- Waste Contractor licences
- Purchasing Records
- Goods Receipt Records including Certificates of Analysis or Conformity if applicable

This list is not exclusive and other documents may be required by the auditor