

METCASH TRADING LIMITED



Metcash Supplier Standard for Food

Version 1 (a)

January 2015

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Amendment History:-

Date	Version	Reason
January 2015	1 (a)	Update to name of Appendix document under Section 6.1

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0.2 How this standard works

The Metcash Supplier Certification Standard for National Suppliers of Fresh and High Risk food products has been prepared to meet the growing demands by consumers for food safety assurance.

This standard specifies the requirements for food suppliers to ensure they comply with Metcash Supplier requirements and relevant statutory and regulatory requirements. Metcash rely on their supplier's ability to meet their food safety requirements. It is the responsibility of all food businesses to assure that food is safe and suitable for consumption. All products are required to be compliant with all current regulations for Federal and State according to where product is sold.

All Metcash suppliers must adhere to this standard in order to supply food products.

Scope

The Metcash Standard scope covers all Metcash Branded Food and also includes bulk and proprietary products from the Fresh Food category areas.

To achieve the requirements of the Metcash Standard, suppliers must develop, document and implement a food safety and quality system that incorporates Codex HACCP and supporting programs with an emphasis on allergen control and management of approved suppliers for the products supplied.

The scope of the food safety and quality manual shall cover all aspects of the supply chain controlled by the supplier. For example: Farm management, Planting, Growing, Producing, Harvesting, Procurement, Receiving, Inspection, Processing, Manufacturing, Packing, Applicable high care processing areas and all associated Storage, Warehousing and Transport It shall also include Contractors or Brokers engaged in any of the above activities

Requirements

All food suppliers are required to implement this standard and compliance will need to be verified by an approved auditing company. Once verification is complete and compliant, certification for the specific products supplied from an individual site is confirmed and your Metcash Approved Supplier certificate will be granted.

Ongoing annual audits are required to ensure the food safety system is effective and to ensure continuity as a Metcash Approved Supplier. Audits may also be unannounced if required. Certification must be current at all times with the certificate covering the scope audited [product manufactured and the process] for the site.

Where food suppliers have food safety and quality systems that are certified by a third party (an accredited body) against approved standards then evidence of their certification is considered sufficient to meet the Metcash standards. If food suppliers are not certified against the approved standards, then they must develop, document and implement a Food Safety system and be audited by an approved auditing company.

The general requirements are that the food safety and quality system includes HACCP, GMP, and supporting programs. Food Safety and Quality systems must be implemented, regularly evaluated, continually improved by the business and verified by a third party on a regular basis.

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The supplier shall hold and maintain a current combined Public and Products Liability Insurance policy for no less than \$20 million AUD for any Metcash branded products or fresh and high risk food products.

Each supplier will have a Trading Terms Supplier Agreement and for suppliers of Metcash Brands, a Metcash Owned Brands Supplier Agreement as well as access to the QA reference guide for suppliers of Metcash owned brands that covers requirements specific to terms of trade or otherwise referenced in this Metcash Standard. Suppliers shall inform Metcash of any change in commercial situation such as use of contract packers or manufacturers, change of address, change of ownership.

Metcash reserve the right at their discretion to change or include any other necessary requirements to the Metcash Standard in order to ensure the safety, quality and regulatory provision of food.

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0.3 How to become a Metcash approved supplier

Procedure for approval as a supplier

The application of the Metcash Standard is site and product specific. All suppliers shall have a food safety and quality system and shall be audited annually at a minimum and currently certified.

Suppliers shall have at least one of the following:

- Any Global Food Safety Initiative (GFSI) recognised food safety schemes: examples include SQF2000 (level 3), SQF1000 (level3), BRC (Global Standard Food), FSSC 22000, IFS, Global Gap etc. Refer to the list of GFSI recognised schemes at <http://www.mygfsi.com/>
- Other recognised food safety schemes: examples include ISO22000, WQA, Primesafe VIC, NZ Gap, Freshcare, Australian Egg Corporation, Codex HACCP, DAFF (AQIS) – Export prescribed goods QA system, ISO9000 (must have in conjunction with another food safety program), Food Industry licensing requirements by any state licensing regulators (must have in conjunction with another food safety program).

Suppliers must provide a current and legible copy of one of the nominated food safety schemes certificate for each site as a minimum. The certificate should match the scope of the product supplied to Metcash (product or category of food supplied and applicable processes).

Any suppliers who do not have any of the above food safety schemes in place must develop, document and implement a food safety and quality system for the products supplied as required by sections in this Standard and agree to comply with the Metcash audit program.

Suppliers will be audited by an approved auditing company of Metcash's choice and once certification has been achieved to the Metcash standard, a Metcash Approved Supplier certificate will be issued for each site of manufacture or head office location.

All food suppliers will be issued with a Metcash Approved Supplier Standard certificate annually on the supply of a current certificate from the approved auditing company or third party (an accredited body) against the Metcash Standard and applicable approved standards.

Brokers associated with Metcash Branded Food and Fresh Food are required to be audited against relevant sections of the standard within the scope of their business. For Brokers of other food products, the manufacturer must have a 3rd party Food Safety based certification relevant to the product supplied.

A list of preferred 3rd party audit agencies for GFSI or Non GFSI standards are covered in the standards matrix. [Refer to appendix] Other 3rd party audit agencies may be considered on application.

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The standards and expectations in this document are based upon the following:

- FSANZ [Food Standards Australia and New Zealand] – FSC [Food Standards Code]
- Codex HACCP - Codex Alimentarius Commission “Hazard Analysis Critical Control Point System (HACCP) and Guidelines for its Application”, Annex II CAC/RCP 1 – 1969, rev 4 (2003).
- ACCC [Australian Competition and Consumer Commission]
- Australian Consumer Law requirements
- National Measurement Institute Trade Measurement Legislation [NMI]
- Australian Cold Chain Guidelines
- Australian State Food Legislation and Regulations
- Department of Agriculture Forestry and Fisheries [DAFF] – Import / Export orders (AQIS)
- ISO (the International Organization for Standardization) 9001:2008 - Quality management systems
- Any relevant State or National regulations
- Metcash documentation:
 - QA reference guide for suppliers of Metcash owned brands (private labels – food products)
 - The Metcash Trading Terms Agreement
 - The Metcash Owned Brands Supply Agreement

Corrective Action Requests (CAR's)

All CAR's from audits shall be addressed as per the following timeframes:

- CRITICAL – supplier suspended from supply to Metcash until further notice
- MAJOR – supplier to address and respond within 14 days from date of audit
- MINOR – supplier to address and respond within 30 days from date of audit

CAR close out timeline extension requests must be made in writing (indicating reasoning) prior to the due date and must be authorised by the Metcash Group Food Safety Manager.

Audit Information

For Metcash branded products, results of any 3rd party audits must be made available to Metcash on request. If a critical CAR is raised the supplier must notify Metcash.

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0.4 Glossary of terms

Branded: A Metcash branded product includes products displaying any Metcash owned and registered name e.g. Black & Gold, No Frills, Chef's Essentials, IGA Signature, IGA Bakers Oven, Canning Creek, Royal Harvest, and IGA Fresh.

Broker: A broker is an individual or business that arranges transactions between a buyer (Metcash) and a seller (Supplier) for a commission.

Contractor: A person, business or corporation which provides goods or services to another entity under terms specified in a contract.

Fresh: A Metcash term for any food products that are sold in the Deli, Meat, Seafood, Fruit & Vegetable Produce, Dairy, Bakery departments by the relevant national category managers who report to the General Manager Fresh.

High risk food products: High Risk, Ready to Eat (RTE) product is a food that is in a state that can be consumed, that is frozen, chilled or ambient where there is a risk of food pathogens growing or surviving through to the point of consumption that could cause illness. As defined by high risk methodology within the QA reference guide for suppliers of Metcash owned brands.

Critical CAR: Where requirements of the food safety program have failed and there is a direct threat to product safety.

Major CAR: Where requirements of the food safety program have not been met and where there is a direct risk to product safety.

Minor CAR: Where the requirements of the food safety program have partially not been met and do not present a direct risk to product safety.

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1.0 Management Systems

The supplier shall develop, document and implement a Food Safety and Quality manual that includes;

1.1 Quality and Food Safety Policy

Senior management shall ensure that the quality and food safety policy:

- is appropriate to the purpose of the organisation in order to achieve safe quality food,
- includes a commitment to comply with regulatory and customer requirements and continually improve the effectiveness of the food safety and quality management system,
- provides a framework for establishing and reviewing objectives,
- is communicated and understood within the organisation, and
- is reviewed for continuing suitability and effectiveness.

1.2 Management Commitment

Senior management shall provide evidence of its commitment to the development and implementation of the food safety and quality management system and continually improving its effectiveness.

Examples of evidence include:

- communicating to the organisation the importance of meeting customer as well as statutory and regulatory requirements,
- establishing the quality and food safety policy,
- ensuring that objectives are established,
- conducting management reviews, and
- ensuring the availability of adequate and suitable resources.

Organizational chart

The supplier shall have an organisational chart indicating the positions within the organisation relating to food safety and quality.

Job descriptions

Job descriptions shall identify responsibilities for positions within the organisation relating to food safety and quality.

Management Review

Applicable senior staff shall review the food safety and quality system to ensure its continuing effectiveness. Management review meetings shall occur at least annually. Records of the review and any applicable corrective actions shall be maintained.

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1.3 Document and Data Control

Documents and data, including records, as determined by the business to be necessary to ensure the effective planning, operation and control of its processes.

- How the Food Safety and Quality system works / is controlled – details of document / data control (e.g. revision date), including how external documents are controlled, how electronic data is maintained, who authorised documents, how current and superseded documents are managed and that only the most current version is available to all staff.
- List of current documents – table of contents or master list or similar
- Amendment register / log – A system of recording changes and updates to the system. E.g. A history of amendments identifying date of change and a summary of the reason of changes to documents and forms etc.
- Records – how they are reviewed, authorised, controlled, stored, time kept for etc.
- Site layout – a facility map identifying the internal floor plan and including external boundaries.

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2.0 HACCP section

The supplier shall develop, document and implement a Food Safety and Quality manual that includes;

2.1 HACCP

CODEX ALIMENTARIUS COMMISSION – RECOMMENDED INTERNATIONAL CODE OF PRACTICE GENERAL PRINCIPLES OF FOOD HYGIENE (including) HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION [Annex to CAC/RCP 1-1969, Rev. 4 2003]

- For all products supplied, the HACCP concept must be applied to support the manufacture / supply of safe quality food.
- The HACCP team shall be assembled using a multidisciplinary team and documented. HACCP team members shall come together from different areas within the organisation and cover relevant shifts. Preferably a team of 3 or more is encouraged. HACCP team members shall have appropriate product specific knowledge and expertise, this information should be documented. Where such expertise is not available on site, expert advice should be obtained from other sources for example external contractors with suitable / relevant qualifications. Evidence of external contractor's qualifications shall be made available.

2.2 Product Description and Intended Use

A description of the product/s and its intended use

- A full description of the product/s, including relevant safety information for the products intended use. Where there are multiple products, it may be effective to group products with similar characteristics or processing steps. Information on intended use should be based on the expected uses of the product by the end user or consumer.
- The scope of the HACCP plan shall be identified, describing the products or groups of products and the food process steps as well as the classes of hazards to be addressed.
- The following points should be used to detail requirements for each product / product group and should also be referenced in the finished product specification.
 - Product Description
 - Composition / Ingredients
 - Method of Preservation
 - Packaging – Primary
 - Packaging – Secondary
 - Storage Conditions
 - Distribution Method
 - Shelf Life
 - Special Labelling
 - Customer Preparation / Intended Use
 - Sensitive Customer

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2.3 Product Specifications

Product specifications for products supplied

Proprietary

- The supplier is responsible for maintaining records of proprietary branded product specifications which must fully describe the product and its' attributes, including all safety, quality and regulatory aspects. Businesses must ensure all products supplied are fully compliant to the specification and it is current in version. Supplier specifications shall be provided on the request of Metcash.

Metcash Branded

- For Metcash branded products the Metcash approved Specification format shall be used. Metcash branded artwork specification approvals shall be maintained and approved by Metcash QA Department, prior to printing. Raw material specifications shall be available for all ingredients used to produce Metcash branded products. Packaging specifications shall be available for all packaging used for Metcash branded products and be fit for purpose, and ensure that none of the components parts or the whole material could compromise food safety.

2.4 Product Development

Product Development activities

- Suppliers shall establish a procedure to describe how new products shall be designed to ensure product safety. Records are to be maintained of product development activities, including a verified shelf life prior to launch of the product. Particular focus is required for allergen control particularly relating to potential cross contamination of any new products, ingredients, processes and the like.

2.5 Flow Chart

A flow chart / diagram to cover all process steps in the manufacture, storage and distribution (as applicable) until received by Metcash or Metcash customers as applicable i.e. charge through or direct.

- The flow chart must be confirmed for all steps and relevant inputs in the operation by a person or persons with sufficient knowledge of the processing operation on site annually.

2.6 Hazard Analysis

A risk assessment of the steps in the process [based on the flow chart]

- List all Potential Hazards, Conduct a Hazard Analysis, Consider Control Measures and Determine CCPs [Critical Control Points] and QCPs [Quality Control Points]. The determination of a CCP and QCP in the HACCP system can be facilitated by the application of a decision tree, or other approaches may be used such as risk rating systems (i.e. WRAC table).
- The supplier shall document the significance of hazards (risk assessment) for each step identified in the flow chart.

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2.7 HACCP Audit Table

A table summarizing the CCPs and QCPs identified in the hazard analysis must align and the CCP's / QCP's shall be numbered accordingly.

- For applicable steps, Establish Critical Limits for each CCP, Establish a Monitoring System for each CCP, Establish Corrective Actions, and Establish Documentation and Record Keeping.

2.8 Validation

Validation of CCPs

- CCP limits must be validated and data maintained to support CCP limit suitability and reviewed annually.

2.9 Verification

2.9.1 Verification activities

Establish a schedule for verification to confirm the HACCP system is working effectively.

- In addition the HACCP plan shall be reviewed when:
 - issues are identified during Management Review Meetings.
 - issues are identified as a result of internal or external audit.
 - changes are made to legislation, regulations or customer specifications.
 - implementing a Corrective Action Request.
 - the systems operating on site are changed [i.e. changes to process flow, recipe, ingredients etc.]

2.9.2 Retention Sample program

Retention samples of products supplied.

- Retention samples shall be retained under the recommended storage conditions for every batch of Metcash branded product, Fresh and High Risk foods for the life of the product.
- The number of samples retained shall be determined based on;
 - the number of production runs
 - the volume of product supplied
 - the associated product risk.
- All Suppliers shall conduct shelf life validation testing including physical, microbiological, and or organoleptic sensory testing on an annual basis to verify their shelf life claim for each product category supplied to Metcash. Records of shelf life validation results shall be maintained. This should include 'challenge tests' as per FSANZ Food Standards Code requirements.

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2.9.3 Testing

Product testing

- Product/s shall be tested as applicable for microbiological, chemical, physical, organoleptic, and product claims against specification and relevant statutory and regulatory requirements using accredited NATA laboratories [or overseas equivalent] for specific testing. The frequency of product testing shall be established by the Supplier based on the risk of product and the volume supplied or at Metcash's request for Metcash own branded product. All product claims should be retested annually.
- Results of any testing must be made available to Metcash on request.
- Other product claims [identity preserved claims] for example: Organic, Kosher, Halal, Free range, RSPO (Roundtable on Sustainable Palm Oil), shall be certified where appropriate or have supporting data to demonstrate appropriateness of claims.
- A product release / assessment program shall be implemented and documented to ensure all requirements relating to product safety, quality and regulatory aspects have been completed as documented in the agreed specification for Metcash branded products.
- Where modified atmosphere packaging is utilized:
 - The suitability of the gas mix must be approved, validated, and appropriate control systems must be in place to manage the delivery of food grade gas to each pack.
 - Seal effectiveness must also be monitored during production and validated for shelf-life of each product.

2.9.4 Weight procedure

Finished product weights

- All Metcash branded finished product shall be equal to or above the minimum net stated weight / volume at the time of production and allowance shall be made for any weight loss during shelf life to ensure the stated net weight is maintained. Where product is sold by number, the count must be correct.
- For Metcash branded finished product, checks on finished product weights shall be conducted and recorded at beginning / middle /end of every production run. Tare weights of packaging shall be checked at least annually.
- Applicable National Measurement Institute Trade Measurement Legislation (NMI) requirements apply for goods packed for sale within Australia and goods fully imported for sale within Australia.
- For products bearing an e mark (Average Quantity System), the supplier must ensure the entire production of that product has passed through a calibrated & functional on – line check weigher. The supplier must also identify that:
 - the average net weight of that production run exceeds the stated net weight, and,
 - any product that is identified as less than 95% of the stated net weight has been rejected from being packed

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2.9.5 Internal Audit program

Internal audits

- At least annually an internal audit is to be conducted of the Food Safety and Quality system to ensure its continuing suitability and effectiveness. Records are to be maintained and applicable corrective action taken.
- The organization shall conduct internal audits at planned intervals to determine whether the system conforms to the requirements of the food safety and quality management system requirements established by the organisation and that it is effectively implemented and maintained.
- An audit programme shall be planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The selection of auditors shall ensure objectivity and impartiality of the audit process.
- A documented procedure shall be established to define the responsibilities and requirements for planning and conducting audits, establishing records and reporting results.
- An internal audit of the entire food safety and quality management system should include the following as relevant to the business activities;
 - Quality and Food Safety policy
 - Management Commitment
 - Policy procedure (Organizational chart/Job descriptions/Site plan)
 - Document and Data Control
 - Management review
 - HACCP
 - Product description and intended use
 - Product Specifications
 - Flow Chart
 - Hazard Analysis
 - HACCP audit table
 - Validation
 - Product Development
 - Verification schedule (Retention Sample program/Testing/Weight procedure/Internal Audit program)
 - Staff Training program
 - Approved Supplier program [Purchasing]
 - GMP (Good Manufacturing Practices) [Construction, building, facilities and amenities / Personal Hygiene / Allergen Control Policy / Site Security / Food Defense / Water Quality]
 - Product Identification and Traceability
 - Cleaning and Sanitation
 - Maintenance
 - Calibration
 - Pest Control program
 - Corrective and Preventive Action
 - Customer Complaints
 - Recall and Withdrawal
 - Business Continuity Plan

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3.0 Category Requirements

The supplier shall develop, document and implement a Food Safety and Quality manual that includes;

3.1 High Risk / Fresh

Ready-to-eat (RTE) foods [including ready to reheat foods] are foods that are ordinarily consumed in the same state as that in which it is sold and there is a wide variety of ready-to-eat foods. Ready-to-eat foods usually include a number of ingredients which may or may not be cooked prior to consumption.

Some ready-to-eat foods also are regarded as 'potentially hazardous'. Such foods can support the growth of pathogenic (food poisoning) bacteria and must be kept at certain temperatures to minimise the growth of any pathogens that may be present in the food or to prevent the formation of toxins in the food.

High risk / Fresh food products managed through the Metcash supply chain systems include bulk and proprietary products in any of the other categories of this section.

Products are considered high risk based on;

- Allergen free statement or product claim
- Par – cooked / raw to heat & serve
- Ready to eat (pH range of 4.0 – 9.0 and an aw of greater than 0.83)
- Thaw to serve (pH range of 4.0 – 9.0 and an aw of greater than 0.83)
- Propensity to have pesticide residues
- Other risks associated with known historical issues pertaining to certain product categories

All high risk / fresh food products shall meet the microbiological, pesticide residues, heavy metals, food additives, chemical and contaminants criteria prescribed for the product in the FSANZ – Food Standard Code.

Any high risk / fresh food products shall be tested for microbiological pathogens in accordance to the product specification and regulatory requirements through to the end of shelf life.

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3.2 Other categories [Meat, Dairy, Seafood, Deli, Bakery, Produce, Egg]

Meat

Any Metcash branded product, high risk or ready to eat meat products shall be tested for permitted chemical additives such as Sulphites and Nitrites in accordance to the product specification and regulatory requirements through to the end of shelf life.

Metcash branded product that contains processed meat products and where different meat species are manufactured at the site, meat species testing shall be undertaken annually. Applicable traceability assessments of meat species shall also be available.

Any % lean claim on processed product shall be tested appropriately and records maintained.

Seafood

Any high risk or ready to eat seafood products shall be tested for chemical known risks such as Heavy metals, Histamine and Bio toxins and microbiological pathogens in accordance to the product specification and regulatory requirements through to the end of shelf life.

Produce

Any high risk or ready to eat produce products shall be tested for chemical MRL (Maximum Residue Limits) and microbiological pathogens in accordance to the product specification and regulatory requirements through to the end of shelf life. MRL testing can be done by the grower or supplier. Brokers can test or obtain results from the grower or supplier.

Eggs

Metcash branded eggs shall be identified according to the farm production system. The farm production system shall comply with industry standards and regulations for Caged, Barn, Free Range, and Organic.

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Imported Food requirements

Imported food items must meet all Australian Import Requirements and suppliers must be able to provide evidence of this compliance.

Category History

A manufacturer of a product category that has known history of food safety issues or a high level of consumer complaints, then additional emphasis and scrutiny may be applied to potential and existing suppliers based on the supplier's history of compliance / performance

All food categories must meet the microbiological, pesticide residues, heavy metals, food additives, chemical and contaminants criteria prescribed for the product in the FSANZ – Food Standard Code.

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4.0 Supporting programs

The supplier shall develop, document and implement a Food Safety and Quality manual that includes;

4.1 Staff Training

Training and Assessment program

- Training and assessment must ensure staff and personnel are competent in skills and knowledge of food safety and quality, commensurate with the activities they carry out. Training and assessment shall be provided in a manner that is suitable, relevant and targeted for trainees. Training and assessment activities may include formal training, demonstrations, instructing, coaching and buddying, on the job upskilling.
- All new staff, employees, agency personnel, visitors and contractors shall be appropriately trained and assessed in relevant food safety, hygiene practices, good manufacturing/ warehousing practices, site specific procedures and food safety responsibilities.
- Training and assessment shall occur prior to commencing work in food production and handling areas, and be refreshed at a frequency of three years minimum, or when there is a change in food standards, regulations , procedures or process that impacts food safety and quality.
- Training and assessment must be provided to skill personnel to manage and monitor Critical Control Points (CCP's) and Quality Control Points (QCP's), commensurate with their work activities.
- At least one representative of the business who is a current member of the HACCP team shall be formally trained and assessed as competent in the principals and application of HACCP and food safety regulatory requirements by an RTO [Registered Training Organisation]. This training and assessment must be refreshed at a frequency of three years minimum, i.e. online refresher training may be used, provided the representative can demonstrate competency.
- Records of training and assessment activities for all personnel must be available. This includes: attendance records, assessment of competence (skills and knowledge), date and duration of training, the training provider / instructor/ assessor, and a copy of training resources / material.
- Training and assessment shall be reviewed annually to ensure it is current, adequate and effective.

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4.2 Approved Supplier Program [including purchasing]

The supplier must ensure that the approved supplier program will provide confidence in purchased materials and related services that they can rely on.

- The selection and approval for approved suppliers must be documented and at a minimum an annual review conducted to assess performance. Purchased materials include but are not limited to ingredients, additives, processing aids, packaging, cleaning chemicals and for related cleaning services, calibration, pest control, storage, transport, and other services etc.
- An approved supplier register is to be maintained.
- Formal agreements shall be obtained for any contract service used by the business.
- Metcash must be informed in writing of any outsourced activities i.e. contract packing, manufacturing etc for Metcash owned Brands.
- Where any problems are found, appropriate corrective action is required and records maintained. Approved suppliers can also be removed from the program based on loss of confidence in the ability to provide a safe, quality product or other issues relating to supply and this method is to be documented.
- The Supplier's Approved Supplier Program shall ensure that their suppliers or co-manufacturers also comply with the Metcash Supplier Standard for Food. For fresh produce lines the supplier must demonstrate certification all the way back to the grower. Where the supplier is a Trader or Broker, they shall hold certification relevant to their activities and their Approved Supplier Program shall demonstrate that all products supplied to Metcash are purchased from processors / manufacturers who are certified according to the Metcash Supplier Standard for Food.

4.3 GMP [Good Manufacturing Practices]

4.3.1 Construction, building, facilities and amenities

- Commensurate with the risk of the product or process, the facility shall be designed, constructed and maintained to ensure product safety.
- The facility shall be managed to prevent cross contamination and be maintained in a clean and hygienic condition.
- The facility and its surrounds shall be maintained in a suitable condition according to the activities on site.
- Equipment shall function in accordance with its intended use and shall permit adequate access for maintenance, cleaning and hygienic practices.
- The supplier shall verify activities and document findings and where problems have been identified take appropriate corrective action.

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4.3.2 Personal Hygiene

- The supplier shall ensure that applicable Food Standard Code requirements for food safety practices and general requirements (FSC 3.2.2) are complied with. The business shall determine personal hygiene requirements for:
 - illness and injury,
 - washing and drying hands,
 - protective clothing & personal adornments,
 - changing facilities and amenities,
 - personal health (personal cleanliness and behaviour),
 - staff movement & visitor policy etc.
- The supplier shall ensure personal hygiene is monitored and documented regularly as applicable, at least on a monthly basis. E.g. this could be done as part of the pre-operational hygiene checks. Records shall indicate any corrective actions taken as result of not meeting personal hygiene requirements.

4.3.3 Allergen Identification & Control Policy

- Allergens need to be controlled through suppliers' ingredients, receipt, storage, cleaning and sanitation, scheduling and manufacture including rework of product to prevent allergen contamination.
- As defined by the FSANZ Food Standards Code section 1.2.3, Mandatory Warning and Advisory Statements and Declarations must be declared on packaging as categorised into 10 groups for allergens.
 - Added Sulphites in concentrations of 10 mg/kg or more
 - Cereals containing gluten and their products
 - Crustacea and their products
 - Egg and egg products
 - Fish and fish products
 - Milk and milk products
 - Peanuts and peanut products
 - Sesame seeds and sesame seed products
 - Soybeans and soybean products
 - Tree nuts and tree nut products
- The supplier shall have an understanding of the FSANZ Food Standards Code 1.2 and all applicable product labelling requirements, including the impact of incidental contact with processing utensils and machinery.
- The Voluntary Incidental Trace Allergen Labelling (VITAL) procedure has been developed by the Allergen Bureau. The supplier is required to utilise the latest version of VITAL to evaluate any product making allergen free claims. Where any allergen free statements or claims are made, then the VITAL assessment must be conducted by suitably trained personnel and documents maintained for the specific product at the site. Where any allergen free statements or claims are made for Metcash branded products or Fresh products, the entire documented VITAL assessment must be supplied to Metcash.
- Where any product/s make an allergen claim, this is to be validated by re-testing on an annual basis using NATA registered laboratories.
- The supplier shall verify allergen control activities and document findings and where problems have been identified take appropriate corrective action.

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4.3.4 Site Security / Food Defence

- Access and security to the site [external building and internal facility] shall be restricted to employees and accompanied visitors or contractors.
- The supplier shall identify any potential or known risks for the product/s supplied if there is potential for
 - deliberate substitution with products [Food Fraud],
 - adulteration,
 - bioterrorism and
 - malicious attacks [Sabotage].

4.3.5 Water Quality

- The quality of water, steam, ice, which comes into contact with food, food contact surfaces or packaging shall be regularly monitored and shall be shown to present no risk to product safety, quality or legality.
- An adequate supply of potable water with appropriate facilities for its storage, distribution and temperature control, shall be available whenever necessary to ensure the safety and suitability of food. Where potable water is not used, it shall be regularly tested to verify its suitability based on the product and process.

4.4 Cleaning and Sanitation

The supplier must ensure that effective cleaning and sanitation of the site and equipment is conducted. Adequate resources must be provided to effectively perform the cleaning functions.

Cleaning activities

- Cleaning activity procedures and or schedules are required.
- Cleaning schedules are to identify:
 - Equipment / Area to be cleaned
 - Person / Department responsible
 - Cleaning procedure / steps
 - Cleaning frequency
 - Cleaning agent / chemical used and dilution / concentration
 - Special instructions including dismantling protocols and storage
 - Safety advice
- The supplier shall separately identify cleaning activities performed by staff and contract cleaning providers. Cleaning records must reflect the cleaning schedules.
- Where contract cleaning is performed, procedures and or schedules shall also be documented for relevant activities conducted.
- Where applicable, cleaning activities for equipment shall be developed and performed according to the relevant machinery specification from the manufacturer.

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- The cleaning schedule activities shall be checked on a daily basis by staff and applicable pre-operational hygiene inspections conducted.
- The supplier shall verify cleaning activities and document findings and where problems have been identified take appropriate corrective action.

Pre-operational Hygiene

- Pre-operational hygiene inspections shall be;
 - conducted by suitably trained staff prior to production commencement for high risk products and for other products based on risk,
 - conducted after equipment breakdown,
 - before re-commencement, to prevent any possible risk of foreign object contamination or the like.
- Warehouse sites used for storage / distribution shall conduct Pre-operational hygiene inspections at least monthly.

Chemicals

- Each site must maintain a register consisting of:
 - All chemicals used for cleaning
 - Evidence of suitability for intended use or instruction from chemical supplier for use of chemical
 - Current Safety Data Sheets [SDS] –(SDS have a 5 year expiry)
- Relevant wall charts, signs, safety warnings and the like are required.

Cleaning Verification

- Suppliers of potentially hazardous foods capable of sustaining food poisoning bacteria shall have a robust swabbing (environmental) program that identifies:
 - All food contact surfaces, and,
 - Non – food contact surfaces where unpackaged food is processed
- Records to verify the swabbing program e.g. microorganism, number of swabs, location of swabs and frequency must be kept.
- The supplier shall also record and take appropriate corrective action when poor swab results are identified.
- Where laboratory swabs are conducted, a NATA registered laboratory shall be used and initially a laboratory representative should verify the adequacy of this swabbing program.

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4.5 Product Identification and Traceability [including labelling]

Product Identification and Traceability

- The supplier must ensure that all product/s is correctly identified during all stages of the process, from receipt to dispatch and or delivery. This includes product at receipt, storage, on hold, rework, product in process, waste or rejected product, returned product and finished product etc.
- Product shall be readily traceable from the purchased inputs to final delivery to the customer. If in the instance that a product recall was required, then this data would be used to trace product.

Labelling

- Labelling of finished product/s must comply with the requirements of Food Standards Australia and New Zealand [FSANZ] Food Standards Code: Chapter 1 General Food Standards; Part 1.2 Labelling and other Information Requirements, and relevant regulatory, industry and recognised codes of practice. Labelling must also be in compliance with the State / National Trade Weights and Measures Legislation and ACCC.
- Verification of the labelling of products shall be conducted as a minimum annually and records maintained.
- All labelling and coding systems are to be legible and indelible.
- Suppliers of Metcash branded products must also meet the conditions of the QA reference guide that covers labelling requirements specific to terms of trade.

4.6 Maintenance

Maintenance is essential to maintaining equipment and the site in good working order. Preventative maintenance reduces the likelihood of breakdowns and supports product safety and quality.

- A preventative maintenance schedule shall be implemented to reduce the risk of hazards in the process. Records of maintenance activities are to be maintained and appropriate corrective action taken and recorded when there is a problem.
- Chemicals used in maintenance activities shall not present a risk to product nor machinery surfaces, with relevant Safety Data Sheets [SDS] available and appropriate documentation for intended use i.e. food grade.
- Contractors and in-house maintenance personnel shall adhere to food hygiene and relevant procedures with food safety training records maintained.
- Appropriate cleaning will be carried out post maintenance / prior to recommencement of production preventing any possible risk of contamination. Approval by management is required before production can commence
- Where applicable, maintenance programs shall be developed and performed according to the relevant machinery specification from the manufacturer.

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4.7 Calibration

Calibration of critical equipment for testing, measuring and inspecting product or process must be correct and accurate.

- The supplier shall ensure that each of its testing, measuring and inspection equipment is accurate and in accordance with all applicable current regulations or laws.
- Records shall be maintained for all calibration activities and any corrective action as appropriate, including management of product affected since the last correct check and identifying and removing inaccurate equipment. A calibration schedule shall be documented and maintained for critical equipment.
- Examples of equipment requiring calibration include, weighing devices (i.e. scales, balances, reference weights), temperature devices (i.e. hand held thermometers, coolroom dials / gauges, vehicle refrigeration dials / gauges), in line devices (i.e. metal detectors), pH meters, refractometers, farm chemical application equipment etc and other relevant equipment used to monitor CCPs or QCPs.
- Equipment shall be calibrated at least annually by a suitable professional and relevant equipment checks shall be conducted and recorded as necessary based on risk. For example rejection mechanisms in line shall be regularly checked during operation to ensure effective control of nonconforming goods e.g. on-line check weigher and metal detector.
- The supplier shall ensure that all measuring instruments identifying pre-packaged net weight of a products are verified by a suitably licensed professional according to National Measurement Institute (NMI) standards.

4.8 Pest Control Program

Pest Control is instrumental for any business so as to eliminate the occurrence of contamination.

- The program shall incorporate relevant treatment of identified pests, focus on the prevention of pests and the effective control in the instance of any pest activity. Pests may include any insect, bird, rodent or animal that poses a contamination risk to food products.
- The supplier shall verify that the pest control program is effective, documenting regular checks and not solely rely on an external pest contractor. Appropriate corrective action and records are required when there is a problem.
- Pest control records must be kept as required by relevant Regulation and Acts, such as;
 - service reports (covering type of chemical used, quantity used, batch number, pest level activity, bait replacement / damage / loss / inability to access, any recommendations or correct action taken by pest controller and each report must be signed by an authorised site representative),
 - bait maps (must be current, dated, authorised and internal / external baits sequentially numbered) (bait maps must be adequate to provide a reasonable level of assurance),

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- chemicals used with relevant Safety Data Sheets [SDS] (SDS have a 5 year expiry),
- pest sighting log,
- pest controller's public and product liability insurance (documents must be available in date),
- pest technician licenses (licenses must be available and in date) etc.

4.9 Animal Welfare

Animal welfare is an important part of Metcash's corporate responsibility.

- Suppliers are required to maintain compliance to all regulatory and codes of practice requirements for animal welfare related to their industry. The supplier shall demonstrate compliance to the related applicable approved supplier animal welfare programs covering Farm, Transport, Sale Yard and Processing.

4.10 Social Accountability

At Metcash we recognise our responsibilities and we aim to set, encourage and sustain high standards of corporate responsibility in everything we do across our operations. This includes promoting and ensuring good standards with our business suppliers.

- Suppliers of Metcash Branded products should develop, document and implement a Food Safety and Quality manual that includes the following policies below.
 - Anti-Bribery and Anti-Corruption Policy
 - Labour Rights Policy
 - Freedom of Association Policy
 - Working Conditions and Health and Safety Policy
 - Child Labour Policy
 - Living Wages (remuneration) Policy
 - Working Hours Policy
 - Anti - Discrimination Policy
 - Regular Employment Policy
 - Harsh or Inhumane Treatment Policy
 - Entitlement to Work and Immigration Policy
 - Subcontracting and Home Working Policy

And suppliers of all other products are required to meet the requirements above.

- Suppliers must comply with all applicable local, state and national laws.
- Metcash asks all suppliers to participate in Social Responsibility requirements (outlined in the QA reference guide) and the requirement for third party audits will be at the discretion of Metcash. Social accountability will not be checked in Australia or New Zealand at the current time, unless at the discretion of Metcash.

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4.11 Environmental Management

Suppliers should have an environmental management program based on materiality of impacts. It should include supporting your policy with initiatives, an implementation plan, allocating responsibilities, monitoring and reporting.

- Policies should include: Sustainability, Energy and climate, Packaging, Material efficiency, Natural resources.
- Suppliers must comply with all applicable local, state and national pollution, waste and sewage laws.
- Metcash asks all suppliers to participate in Environmental Management requirements (outlined in the QA reference guide) and the requirement for third party audits will be at the discretion of Metcash.

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5.0 Corrective And Preventative Action

The supplier shall develop, document and implement a Food Safety and Quality manual that includes;

5.1 Corrective and Preventative Action

Corrective and Preventative action is required when problems are identified and action needs to be taken to correct and prevent reoccurrence.

- Records of the problem and action/s to correct the issue must be kept, as well as root cause analysis and any applicable preventative actions.
- Corrective and preventative actions shall be verified as effective and reviewed as part of the management review.

5.2 Customer Complaints

The handling of Customer Complaints is fundamental to a business's obligations.

- When customers notify the business with a complaint or compliment regarding product safety or quality, details must be recorded and the complaint attended to promptly and effectively.
- Any trends or customer complaints that escalate will be handled appropriately and should be considered in connection to product recall and withdrawal. Complaints for any Metcash branded products and fresh category products handled through the Metcash supply chain shall have trend analysis completed.
- Metcash shall be informed of issues from suppliers of Branded product regarding product safety, quality or regulatory compliance where other product or like products are affected. For example: foreign object contamination of a proprietary product that is also manufactured under the Metcash brand.

5.3 Recall and Withdrawal

The Australia New Zealand Food Standards Code requires manufacturers, wholesalers and importers of food to have a system in place to manage the recall of unsafe food. The requirement is specified in clause 12 of Standard 3.2.2 – Food Safety Practices and General Requirements.

- Food Standards Australia New Zealand have developed a Food Industry Recall Protocol that provides information on recalling food in Australia and guidance for food businesses on developing a written food recall plan.
- Applicable regulatory requirements apply i.e. Australian Consumer Law and ACCC.
- Metcash consumer support (1300 135 690) shall be advised within 1 hour where any of their branded products regarding product safety, quality or regulatory compliance require product withdrawal or recall. Suppliers will liaise immediately to any request as directed by Metcash for recall or withdrawal action for Metcash branded products according to the supplier agreement.

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- Metcash shall be informed of related product recalls where like products supplied are affected. Relevant Metcash recall contact details shall be documented in the recall procedure.
- A mock recall shall be undertaken annually to verify traceability and that the recall policy is suitable, if the supplier has not performed a recall in the last 12 months. Records shall be maintained.

5.4 Business Continuity Plan

A Business Continuity or incident management plan is required for businesses to reduce the probability of an incident occurring, respond to a crisis situation, and recover from a crisis for natural disasters or man-made events.

- The Business Continuity plan shall be reviewed and updated at least annually.
- For Metcash branded product/s a mock crisis shall be conducted annually.