

Audit Report - M/s. Choice Canning Company Unit III, A Division of Choice Trading Corporation Private Limited Seafood Processing Standard Issue 5.1



Basic Facility and Audit Information

Facility Cert Number	Facility Name	Name of Certification Body	Auditor
P10977	M/s. Choice Canning Company Unit III, A Division of Choice Trading Corporation Private Limited	SGS	Ja [REDACTED]

Addresses	Audit Start Date	Audit End Date
R. SY.NO. 2/4,5,3/1,2,3,4,4/1 and 4/4, Potukuru(V), Magam Road, , Ainavilli (M), Dr. B.R. Ambedkar Konaseema District, Andhra Pradesh, India, 533577	2023-10-04	2023-10-06

Latitude	Longitude	Audit Announce Type	Remote Audit
16.577499389648438	82.00309753417969	Unannounced	No

Facility License #	Enhanced Social Accountability Audit	Audit Contact Name
1954	No	K Sh [REDACTED]

Harvest Designation of the Facility	Facility Email	Audit Contact Email	Audit Contact Phone
Aquaculture only	sre [REDACTED]@choicegroup.in	ksh [REDACTED]@choicegroup.in	0 [REDACTED] 1517

Facility Website
www.tasteechoice.com

Audit Details

Audit Type	Audit Duration	Secondary Auditor	Audit Shadower
Re-Certification	3	Nil	Lax [REDACTED]

Audit Witness	Social Accountability Auditor	Audit Observer	APSCA Member Firm Number
Nil	N/A	Nil	-

APSCA Auditor Number
-

Audit Notes

The Factory has required licences and approvals.
 A Quality Management System System is in Place.
 The Site is currently Certified to BRCGS Global Standard For Food Safety. Food safety manual along with HACCP manual, SOP manual, SSOP manual and department manuals are available. HACCP team established. Hazard analysis done with proper justifications. All hazards identified. CCPs monitoring verified. No nonconforming products identified. Process controls and storage controls are evident. Product traceability verified and found satisfactory.
 Policies and procedures related to food safety, Environment, health and safety, social criteria etc. Workers are paid above minimum wages specified by national and Local legislation.
 Measures are taken for Employee Health & safety. Environmental Controls are in Place. Waste disposal done as per environmental regulations.
 Some gaps were observed with respect to linking of new BAP farms in website, application of unique codes for star status identification, updation of cGMP manual as per 21 CFR 117, coliform test method used, swab collection frequency, communication of social policies in local languages, works committee membership, safety of cold room worker etc.

Site Visit Notes

Site Visit Notes
 The processing, storage areas within the site observed to be maintained at a satisfactory level of hygiene and cleanliness with respect to food safety during audit. The production areas are adequately pest proofed.
 Change room facilities are adequate and proper communication of policies related to food safety, health and safety, social etc.
 Vannamei Shrimp was being processed (Frozen Cooked IQF) during site visit. Verified the checks carried out during receiving - (CCP-Sulphit/antibiotics), cooking steps, inprocess and packing (CCP-labelling), metal detection, cold storage etc. Necessary product samples collected by sampler from competent lab under auditor supervision.
 Verified health and safety provisions in the facility for example availability of fire extinguishers, sprinklers over ammonia receivers, containment for hazardous materials such as fuel, chlorine etc.; emergency escape routes etc.
 Chemicals are stored under access control in designated sites
 Visited the facilities other than processing for example laboratory, dormitories for women, kitchen and eating areas, men's dormitory, water treatment and storage system, RO system (for ice and glaze water); The treated water storage tanks well covered and protected. Chill water system also in place. Checked the flake ice/tube ice production equipment as well as storage rooms.
 Interviewed personnel from various sections with respect to food safety, quality, health and safety as well as social criteria.

Previous Audit Date	Date of First BAP Certification	Animal Survival Rate	Feed Conversion Rate
2022-11-10	2023-01-10	0	0

Non-Conformance Totals

Critical	0
Major	0
Minor	7
Yes	287
N/A	66

Audit Company Profile

CHOICE CANNING COMPANY UNIT III (Division of Choice Trading Corporation Pvt Limited) taken over from THREE SEASONS EXIM PVT LTD on wet lease agreement with integrated activities engaged in exports operations. The company exports cultured shrimps globally. The company is promoted and managed by a team of experts with rich experience in processing and quality control. The unit at Potukuru Village and fully equipped, modern processing units. There are two IQF equipment lines are fully imported and match world-class standards. Two Block Freezing equipment.Stringent hygiene conditions are maintained for processing with quality checks at every stage. The unit complies with HACCP guidelines and comprehensive infrastructure facilities with good manufacturing practices lead to smooth procurement, processing & dispatch operations. The product range includes block frozen HLSO, PD, PD Tail on, PUD shrimps also IQF varieties of PD Tail on, PD Tail-off, Cooked & peeled tail on, Easy peel varieties shipped to international markets in own brand and customer's brand. The organisation has invested in raw shrimp supply chain control - using mobile antibiotic testing lab for testing shrimp prior to harvest. The organisation has also communicated its expectation to farmers and suppliers clearly regarding antibiotic residues.

Scope of Audit

Total Production

37.8

Product Form Source	Total Production	% of Total
Farmed	37.8	100%
Wild Caught	0	0%

Species Scientific Name	Species Category	Product Forms Source	Product Forms	Product Details	Total Production
Penaeus monodon	Shrimp	Farmed	Cooked,Raw Frozen	No Production in 2022	0
Litopenaeus vannamei	Shrimp	Farmed	Cooked,Raw Frozen	2022 Production Data Vannamei Shrimp- only 4 star products were produced Raw Frozen -Finsihed products 13.72 MT Raw material quantity - 19.6 MT, Yiled 70.0% Frozen cooked shrimp - Finished product 24.1 MT Raw Material quantity - 40.1 MT Yield 60.0% Total Production in 2022 Finished product 37.8 MT	37.8

Key Personnel

Total Number of Full time employees

380

Name	Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr. Gau [REDACTED]	COO	Yes	Yes	No	Yes
Mr. Abh [REDACTED]	Manager QA	Yes	Yes	Yes	Yes
Mr. Sre [REDACTED]	Senior Manager QA	Yes	Yes	Yes	Yes
Mr. Pre [REDACTED]	Senior Executive HR	Yes	Yes	Yes	Yes

Mr. P. Ba [REDACTED]	Senior Technologist	Yes	Yes	Yes	Yes
J. Ra [REDACTED]	Pant Engineer	Yes	Yes	Yes	Yes

Does the applicant use employment agencies or employee leasing companies as a source of workers?

Yes

Primary Nationality of Management - In Rank order 1-3	Primary Nationality of Workers - In Rank order 1-5	Primary Nationality of Workers - Percentages
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Country 1: India
Country 2:
Country 3:

Country 1: India
Country 2:
Country 3:
Country 4:
Country 5:

Country 1: 100%
Country 2: 0%
Country 3: 0%
Country 4: 0%
Country 5: 0%

Local Male Workers

Migrant Male Workers

Male Production Supervisor

Permanent: 0
Temporary: 0
Agency: 0

Permanent: 0
Temporary: 100
Agency: 0

95%

Local Female Workers

Migrant Female Workers

Female Production Supervisor

Permanent: 0
Temporary: 0
Agency: 0

Permanent: 0
Temporary: 150
Agency: 0

5.00%

Does the facility provide on-site housing (dormitory) for workers?

If yes, is the housing a sub-contracted service?

Total Number of employees in facility housing

Yes

No

250

**Audit Report - M/s. Choice Canning
Company Unit III, A Division of Choice
Trading Corporation Private Limited
Seafood Processing Standard Issue 5.1**



Basic Facility and Audit Information

Pillar	Reference	Conforming
Food Safety	1.1	Yes
Clause and Explanation		

Clause:

The facility shall demonstrate that they are entitled to process and produce seafood at the site applied for.

Explanation:

Verified Relevant documents cited in section below.

The organisation has required licences, approvals and other documentation to demonstrate compliance with local and national regulations that include land use, water use, factory construction and operation, legal rights to export seafood, and environmental compliance.

The original documents were provided by - QA Manager

Pillar	Reference	Conforming
Food Safety	1.2.1	Yes
Clause and Explanation		

Clause:

Documents are available to prove legal land and water use by the facility.

Explanation:

Copies of The land sales deed from Sub Registrar, Amalapuram on dated 23/03/2015 vide document no. - 20174/2015, with an area of total 30391.89 Sq.m(AC 7.51). and total built up area is 8654.47 sq. mts. Lease Agreement between the Land Owners and the facility verified dated 13/06/2022. Validity for 3 years. There is a Restated Lease Agreement dated 29 April 2023 valid for three years from 01 April 2022.

Tax-Land Tax vide

Challan no. -449 dated for April 2022-Mar 2023 - Shankaraygudam Panchayat - Aiyanavalli Mandal

Challan no. 356 - Door No. 2-186 for April 2022-Mar 2023 Potkurru Panchaya- Aiyanavalli Manda,

Electricity-Electricity bill Consumer # RJY1713 (M/s Three Seasons Exim Limited,- Aug 2023 for Rs. 5809272/-."Eastern Power Distribution Company of Andhra Pradesh

Water-Letter No. 1048/Hg-II/2018 dated 27.10.2020 from Govt. of Andhra Pradesh - Ground Water and Water Audit Department - permitted to draw 200 KLD (water meter required as per terms and conditions).

Pillar	Reference	Conforming
Food Safety	1.2.2	Yes

Clause and Explanation

Clause:

Documents are available to prove all business and operating licenses have been acquired by the facility.

Explanation:

Certificate of Registration of processing plants issued by Export Inspection Council Of India, Government of India under approval no: 1954 valid till 24/05/2025.

Valid Factory License to work available, Factory License 08/2022 and Registration No. - 117052 dated 08/04/2022 and transferred to Chooice canning as per Endorcement # FDEG-FL0LC(TL/AOW)/10/2022-JA(B)-KKD1

Certification of Registration from MPEDA (The Marine Products Export Development Authority) for Shrimp MPEDA Registration No. AP6/PP/058/222 for Processing plant, AP6/SP/075/22 for Storage, AP6/PC/064/22 for Peeling Shed valid up to 04/09/2025.

Facility as an Exporter - tn1/MT/422/15 validity 18/05/2026

FSSAI - 10122999000218 valid up to 12/06/2025

FDA Registration Number: 19612096068, Valid till 31/12/2024

IEC - 1001001958

Fire NOC 723/DFO/EG/A1/2021 MSB-ER dated 08/07/2022 valid upto 08/07/2027.

Pillar	Reference	Conforming
Food Safety	1.2.3	Yes

Clause and Explanation

Clause:

Documents are available to prove compliance with applicable environmental regulations for construction and operation.

Explanation:

Consent order from Andhra Pradesh Pollution Control Board, ; Consent Order No. Pollution control consent order No: 6132-/APPCB/ZO-VSP/KKD/ CTO2023- valid up to 03/04/2024.for water & air issued by Joint Chief Environmental Engineer. Trade effluent 450 KL/day; Domestic effluents is 08 KL/day. Also letter dated 08.06.2022 - confirms that Site has ETP capacity of 700 KLD.

Building stability certificate issued by Licensed Surveyor Mr. Sre [REDACTED] (NMC Licence # [REDACTED]) on dated 25/03/2022 valid for three years. DG Permission vide Report No. - 1 6(B)/2017-18 dated 12/04/2017 & 19/2017-18 dated 17/05/2017

Pillar	Reference	Conforming
Food Safety	1.2.4	No - Minor

Clause and Explanation

Clause:

Documents are available to prove that the facility is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce seafood in, the countries they export to, and source countries if applicable. This includes all food safety regulations.

Explanation:

The facility is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce seafood in, the countries they export to. This is evident from

References quoted in Documentation -

Food Safety and Quality Manual

Quality Management System Manual

Licences and approvals available

Specifications and Testing plans for raw materials, products, water and ice, packaging materials

Minor NC

cGMP Manual - CCCIII/GMP/001 ver 1.2 dated 02-Jan-2023 is based on 21 CFR 110. Facility has not reviewed and updated the same to be in line with 21 CFR 117

Pillar	Reference	Conforming
Food Safety	2.1.1	Yes
Clause and Explanation		

Clause:

The facility shall have an appropriate Quality Management System that is documented, authorized by senior management, effectively implemented, maintained and continually improved.

Explanation:

Policies related to food safety and quality, health and safety as well as social policies are in place

Food Safety and Quality Manual -CCCIII/FSMSM/01 dated 01/04/2022 Issue -01, Rev #0

HACCP Manual- CCCIII/M/001 Ver 1.3 dated 01-Apr-2023

SSOP Manual

cGMP Manual - CCCIII/GMP/001 ver 1.2 dated 02-Jan-2023

Lab Manual - CCC/SOP/LAB

It Includes also food defence and security program.

Pillar	Reference	Conforming
Food Safety	2.1.2	Yes
Clause and Explanation		

Clause:

The QMS shall be reviewed and updated as often as necessary, especially after a food safety incident or product recall, with a minimum frequency of annually.

Explanation:

All key manuals and procedures have been reviewed.

Last Review dated: 01-Apr-2023

No food safety incident, No Recall.

Pillar	Reference	Conforming
Food Safety	2.1.3	Yes

Clause and Explanation**Clause:**

Facilities shall have a copy of the current Seafood Processing Standard on site. Copies may be a printed or electronic version.

Explanation:

Facility is having the copy of the current Seafood Processing Standard (SPS-5.1) on site. Copies as printed and electronic version.

Pillar	Reference	Conforming
Food Safety	2.1.4	Yes

Clause and Explanation**Clause:**

The Quality Management System shall include a clear Food Safety Management System based on HACCP. (This can either be part of the QMS or a separate document).

Explanation:

The QMS included a clear Food Safety Management System based on HACCP principles referring to HACCP System and Principles CAC/RCP1-1969, Rev. 4(2003) latest version 2022

USA HACCP Regulations 21 CFR-123,

EU Food Sanitation Regulations 852/2004 & 853/2004 .

Other Certification Standards such as

Plant has an HACCP based food safety management system described in FSMS manual and also draws reference to HACCP Manual for Planning and realization of Safe products. Refer to comments in Clause 2.1.1.

Pillar	Reference	Conforming
Food Safety	2.1.5.1	Yes

Clause and Explanation**Clause:**

Identify the processes for the quality and food safety management systems.

Explanation:

The HACPP, QMS & FSMS manual details the identification of process

QMS Processes- Departments- Procurement, marketing, production, quality control and assurance, maintenance, Human Resources, Health Safety and Environment (HSE) etc. with documented procedures, process approach and controls, Monitoring, management review and Internal Audit, Testing and Calibration, Verification, validation

FSMS - Traceability, PRPs, HACCP (flow diagrams, hazard Analysis and plans), Emergency preparedness, etc.

Pillar	Reference	Conforming
Food Safety	2.1.5.2	Yes

Clause and Explanation**Clause:**

Determine the sequence and interaction of these processes.

Explanation:

Sequence and interaction of the process covered in QMS, FSQMS and HACCP manual. The company has identified the processes required for effective control and implementation of a Food Safety and Quality Management System.

Pillar	Reference	Conforming
Food Safety	2.1.5.3	Yes

Clause and Explanation**Clause:**

Determine criteria and methods required to ensure the effective operation and control of these processes.

Explanation:

Effective operation and control of these process are achieved by building and maintaining infrastructure, machinery and processing operations. They also built a team of talented, educated, trained workers and staff for speedy processing operations & Quality control. Organizational requirements, customer requirements & feedback and regulatory requirements are categorized under input criteria, Food safety and quality manual, HACCP plan, Documented procedures, process approach and standards & reviews are categorized under processes (methods) and output criteria is defined as organization effectiveness and efficiency in achieving its objectives Doc No. The company has identified the processes required for effective control and implementation of a Food Safety and Quality Management System

Pillar	Reference	Conforming
Food Safety	2.1.5.4	Yes

Clause and Explanation**Clause:**

Ensure the availability of information necessary to support the operation and monitoring of these processes.

Explanation:

Information are .available throughout the process chain and flow of information both vertical and horizontal throughout the organization and required manpower and financial resources are made available to support operation and monitoring of the process. Supported by Management Review Meeting and Internal Audits, Testing & Validation.

Pillar	Reference	Conforming
Food Safety	2.1.5.5	Yes

Clause and Explanation**Clause:**

Implement action necessary to achieve planned results and continual improvement.

Explanation:

The Continual Improvement achieved by implementation of GMP & SSOP requirements. Supportive documents like Work Instruction, SOP, SSOP Manual, Training Records, Corrective Action Records, SSOP Monitoring Records, HACCP Monitoring Records are maintained and updated.

Pillar	Reference	Conforming
Food Safety	2.2.1	Yes

Clause and Explanation**Clause:**

The facility shall have an appropriate Quality Manual which incorporates Food Safety that is readily available to all personnel involved in quality management. The Quality Manual shall include controls that address all requirements of the SPS Standard, including the Annexes. Copies may be a printed or electronic version.

Explanation:

The manual is reviewed annually and whenever a need arises. QMS is authorized by Chief Operation Manager. QMS manual is addressing all the clauses adequately. The quality manual readily available to all personnel involved in quality management. The distribution list documented in Issue Note.

Pillar	Reference	Conforming
Food Safety	2.2.2	Yes

Clause and Explanation**Clause:**

The Quality Manual shall include the products to be processed. The Quality Manual shall also include documented procedures or specific reference to them.

Explanation:

List of Products Processed by Facility include
 Processing of Frozen Raw and Cooked Shrimps
 Product Species:
 Farm Raised Shrimp
 (Litopenaeus vannamei & Penaeus monodon)

Different products processed and procedures were described in Quality Systems Manual and a clear reference has been drawn to the procedures like SOP's, SSOP's & GMP's.

Pillar	Reference	Conforming
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Food Safety	2.2.3	Yes
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Clause and Explanation

Clause:

The Quality Manual shall clearly define all of the quality attributes for all raw material received, and finished products produced, that shall be monitored and controlled to ensure conformance to legal requirements and customer and facility specifications.

Explanation:

Quality Manual clearly defines all of the quality attributes for all raw material received, and finished products in RM Specification-GMP Manual - CCCIII/GMP/001 - page 36

FG Specification- CCCIII/GMP/001 - page 46

Specification for materials other than raw materials are available in GMP Manual - CCCIII/GMP/001 Ver 1.2 - for STPP, Master Cartons, poly pouches (as per EU10/2011 and amendments)

Quality attributes are defined in Raw Material Purchasing Specifications which are sent to suppliers for sign-off, and finished product specifications are also monitored at the facility by QA team which is used to verify by the FSTL. Documented specification in company format for finished product specifications, prepared as per buyers and EIA instruction available for shrimp

Pillar	Reference	Conforming
Food Safety	2.2.4	Yes

Clause and Explanation

Clause:

The Quality Manual shall define the attributes cited in 2.2.3 to include, at a minimum, conformance requirements for: labelling, net weight, size, proper sensory attributes, color, and all appropriate defects such as presence of shell fragments, bones, skin, bruising, trimming defects, canning seam defects, container and closure defects, semi-rigid and flexible container damages, and any other appropriate parameters.

Explanation:

Ref. 2.2.3, Incoming Inspection is practiced. Facility is regularly monitoring the quality attributes of raw materials while receiving and finished products by online monitoring checklists such as presence of shell fragments, Foreign matter, bruising, trimming defects, and so forth for raw materials and labelling, net weight, size, proper sensory attributes for finished products.

Pillar	Reference	Conforming
Food Safety	2.2.5	Yes

Clause and Explanation

Clause:

The Quality Manual shall define the sampling size, testing frequency, procedures, maximum or minimum tolerance levels, corrective action, responsible personnel, and recordkeeping requirements associated with all of the quality management procedures.

Explanation:

Sampling size, testing frequency, procedures, maximum or minimum tolerance

levels, corrective action, responsible personnel, and recordkeeping requirements associated with all of the quality management procedures are defined in Lab sampling Procedure CCC/SOP/LAB/SOP, also in GMP Manual

CCCIII/GMP/001

Also in SOP Manual - Shrimp Raw Material Evaluation and Acceptance SOP/DOC/02a including Annexure I

A comprehensive sampling and testing plan covering BAP requirement also is available authorized by FSTL Sre [REDACTED]

Ref:

Also, Details mentioned on clause no. - 4.4.1.

Pillar	Reference	Conforming
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Food Safety

2.3.1

Yes

Clause and Explanation

Clause:

As part of the Quality Manual, the facility shall have a clearly defined, documented Quality Management System Policy statement, authorized by senior management, that reflects its commitment to the entire scope of the SPS Standard, including the Annexes.

Explanation:

Documented Quality Management System Policy statement in place, authorized by senior management, that reflects its commitment to the entire scope of the SPS Standard, including the Annexes.

Policy in HACCP Manual dated 10.April-2023 and also displayed.

Authorized by: Factory Head is Mr. Rak [REDACTED]

Pillar	Reference	Conforming
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Food Safety

2.3.2

Yes

Clause and Explanation

Clause:

The facility shall define, document, and ensure that food safety and quality objectives are monitored with measurable outcomes.

Explanation:

Measurable objectives are established and monitored for achievement as per agreed timelines.

Monitoring record of last year objectives were verified.

Some of the objectives for the period 01.07.2023 to 30.09.2023

1. 100% NC closure within 15 days of Internal audit report –
 2. 10 Man hours of Training /Quarter - Achieved
 3. To meet customer Delivery Expectations- 95%
 4. Break down down-time maximum 10 hrs /quarter.
 5. Complete GACC approval for the facility
 6. No rejection of raw material and packing material due to quality of food safety deviations.
- etc.

The food safety & quality objectives being monitored, and results were reported to plant manager at quarterly frequency. Continual improvement is achieved by revising objectives and targets.

Pillar	Reference	Conforming
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Food Safety

2.4.1

Yes

Clause and Explanation

Clause:

The facility shall have an organizational chart that reflects the current plant management and, at a minimum, those employees and their back-up personnel responsible for compliance with quality assurance, legality, and food safety requirements.

Explanation:

Organization Chart verified

Ref:CCCI/DOC/26

has been developed and effective communication channel has been established. Well experienced team, food processing background with multi task and responsibility. Reporting structure is properly established. Managing Partner, Partner, GM, QA Manager, Account & HR manager, Corporate export manager and Purchase manager is individually reporting to GM.

Pillar	Reference	Conforming
Food Safety	2.4.2	Yes

Clause and Explanation

Clause:

The facility shall also define and document job functions, responsibilities and reporting relationships of at least those employees whose activities affect product quality, legality and food safety.

Explanation:

Job functions & Responsibility & Authority verified against the Organisational Structure

Ref:CCCI/DOC/27

Job responsibilities were documented in the same and agreed by all the key staff members those are responsible for product safety
Delegation of responsibility in case of absence of key person is defined.

Pillar	Reference	Conforming
Food Safety	2.4.3	Yes

Clause and Explanation

Clause:

The facility shall clearly identify the Staff Member accountable for the maintenance of the Quality Management System and for the company meeting and adhering to all of the requirements of the Seafood Processing Standard.

Explanation:

Roles & Responsibilities is available detailing staff member responsibilities and accountability (HACCP Manual under job responsibility). Mr. Sre [REDACTED] (Sr. QA Manager) is responsible for the Maintennace of QMS. It is documented and communicated. Supervision of work is evident.

Pillar	Reference	Conforming
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Food Safety 2.4.4 Yes

Clause and Explanation

Clause:

The facility shall identify the membership and competency of the HACCP Team. Competency shall be demonstrated through documented evidence of HACCP training.

Explanation:

The HACCP system is designed as per Codex Alimentarius and EIA and FDA guidelines and HACCP requirements. The multi-disciplinary team comprises 8 members from different departments (production, QC, purchase, H & S, Stores, Accounts, and plant engineer) has been documented in HACCP Manual CCCIII/M/001, version 1.3 dated: 01.04.2023. The HACCP Team Leader is Mr. Sre [REDACTED] he is a Postgraduate in Microbiology and has 11 years working experience with sea food industry and completed HACCP training in the year 2023 from Intertek. All Team members are externally trained. Related records are available. Team members were found aware about HACCP principles, trained from internal as well as external source.

Pillar	Reference	Conforming
Food Safety	2.4.5	N/A

Clause and Explanation

Clause:

Facilities that produce shelf-stable acidified foods and low-acid canned foods in hermetically sealed containers, i.e. canning, retorts, aseptic processing and product formulating systems (including systems wherein water activity is used in conjunction with thermal processing) shall demonstrate their compliance with the regulations to control these processes. (Note: For facilities operating in the USA, guidance can be found at:

Explanation:

Not applicable. No LACF Products.

Pillar	Reference	Conforming
Food Safety	2.4.6	N/A

Clause and Explanation

Clause:

Operators of the processing systems detailed in 2.4.5 (including container closure inspectors) shall be under the supervision of a person who has satisfactorily completed the prescribed course of instruction approved by the US FDA (or equivalent) for giving instruction appropriate to the preservation technology involved.

Explanation:

Not applicable. No LACF Products.

Pillar	Reference	Conforming
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Food Safety	2.5.1	Yes
Clause and Explanation		

Clause:

The facility's senior management shall demonstrate their commitment to the development, implementation, and continuous improvement of all elements of the Quality Management System in order to ensure compliance with the entire scope of the Seafood Processing Standard (including Annexes).

Explanation:

Senior Management is committed for continuous improvement of all elements of the quality issue in order to ensure compliance with the BAP standard (Including Annexes). The senior management of the company actively take part in the management review conducted once in a year. They shows commitment to the development and implementation of the Food safety and quality management system. They have approved and authorized to implement systems like HACCP, BAP as well as other certifications and have achieved and maintained certifications for all these standards. They are present at the opening and closing meetings of various audits

Pillar	Reference	Conforming
Food Safety	2.6.1	Yes
Clause and Explanation		

Clause:

The facility's senior management shall determine and provide, in a timely manner, all the resources needed to implement and improve the processes of the QMS and to address customer satisfaction.

Explanation:

Required financial and human resources are provided. Infrastructure was found as per the requirement of the sea food processing unit. Required facility and equipments is provided. The suitability of operating personnel is determined on the basis of education, training, skills and experience. Requisite manpower and financial resources are made available for normal operations of the factory with flow of information and date percolating vertically and horizontally amongst the staff and workers.

Pillar	Reference	Conforming
Food Safety	2.7.1	Yes
Clause and Explanation		

Clause:

The facility's senior management shall be involved in the QMS review of all plans, procedures and systems necessary for compliance with the full scope of the Seafood Processing Standard (including its Annexes).

Explanation:

Senior Management Participates in Management Review Meetings.

The agenda discussed includes points like audit findings & CAPA, customer complaints & feedback, process performance, HACCP review, Resource requirement, food safety policy & objectives including all QMS review, Legal Issues & status etc. The output of the MRM is recorded in terms of revision of objectives training requirement, process improvement
Etc.

Last MRM Conducted on 10.10.2022

Chaired by Managing Director.

Next meeting is scheduled on 09.10.2023 as per circular dated 29.10.2023.

Pillar	Reference	Conforming
Food Safety	2.7.2	Yes
Clause and Explanation		

Clause:

Management reviews shall occur at planned intervals and at a minimum annually. These reviews shall ensure the plans, procedures and systems are up-to date and continue to be effective.

Explanation:

MRM frequency once in 12 months. The minutes & outcome of the MRM is documented adequately. The follow up activities with time frame are also documented as the per the schedule, documents are verified during the Audit. Last MRM Conducted on 10.10.2022

Pillar	Reference	Conforming
Food Safety	2.7.3	Yes
Clause and Explanation		

Clause:

Minutes of the management review meeting shall be maintained and available for review. The minutes shall include, at a minimum: attendees, agenda items, key decisions, and follow up actions with time scales and accountabilities. Follow up actions shall be closed out in a timely manner and the results shall be documented.

Explanation:

Minutes of the MRM is maintained and available for review. The minutes included, attendees, agenda items, key decisions, and follow up actions with time scales and accountabilities are follow up as per as timeline, checked and verified. Follow up actions are closed out within the scheduled time and the results are documented properly which are available during the audit.

Last MRM Conducted on 10.10.2022

Chaired by Managing Director.

Next meeting is scheduled on 09.10.2023 as per circular dated 29.10.2023.

Pillar	Reference	Conforming
Food Safety	2.8.1	Yes
Clause and Explanation		

Clause:

The facility shall document all items purchased that impact food safety, regulatory requirements and quality. The purchasing process shall be controlled to ensure these items conform to requirements. (Examples of items include but not limited to raw material, finished product, packaging, additives and ingredients.)

Explanation:

Yes available, Supplier Approval Procedure in Place for Raw Materials, Packing Materials, Ingredients additives and Finished Products.

Ref : Supplier approval and monitoring procedure - CCCIII/SOP/07 for Ingredient & Packing Material Purchase & SOP/DOC/02a for Shrimp Purchase

Sampling procedure of specification is documented in the same document. Purchasing is done as per specification issued by the facility for all items such as raw materials and other general materials including ingredients and chemicals. Inbound materials are generally accepting as per as specification with supportive COA, test reports, MSDS and in house sampling process as specification sampling.

Approved Supplier list in place and verified

Ref: Verified list of approved suppliers of raw material Approved supplier list for shrimps CCCIII/DOC/67 for 2023- All farms are audited before each harvest. Verified Farm Audit Reports as part of traceability exercise. Ref CCCIII/REC/87 Approved supplier list for packaging and ingredients CCCIII/DOC/67

All the related records are readily available with duly authorized signature during the audit. Specifications are held in QA Laboratory under QA

Manager and control copies were readily available to the personnel requiring them.

Pillar	Reference	Conforming
Food Safety	2.8.1.1	N/A
Clause and Explanation		

Clause:

A procedure shall be in place to identify and control all hazards associated with receiving/accepting/purchasing of wild harvested raw materials from private independent harvesters.

Explanation:

No wild Caught.

Pillar	Reference	Conforming
Food Safety	2.8.1.2	N/A
Clause and Explanation		

Clause:

Determination for acceptance shall be based on, but not limited to, HACCP criteria as indicated for source control.

Explanation:

no Wild caught materials Only Aquacultured.

Pillar	Reference	Conforming
Food Safety	2.8.1.3	N/A
Clause and Explanation		

Clause:

All raw materials acquired from wild harvest sources shall be in full compliance with local, tribal, state, federal, or international harvesting regulations and shall not be from RFMO (Regional Fisheries Management Organizations) Combined IUU Vessel List.

Explanation:

no Wild caught materials Only Aquacultured.

Pillar	Reference	Conforming
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Food Safety	2.8.2	Yes
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Clause and Explanation

Clause:

The facility shall demonstrate control as noted in 2.8.1 through, at a minimum: the appointment of designated purchasing personnel and written purchasing procedures. (See also 2.10 - "Supplier Approval and Performance Monitoring").

Explanation:

Purchasing done as per specification issued by the facility for all items such as raw materials and other general materials including ingredients and chemicals. Purchasing procedures and Purchase Specification is documented for all items purchased.


Designated personnel have been assigned for Purchase

RM

PM

Ingredients and chemicals

Etc.

Raw material Purchase is done through Factory manager, Mr. Rag 

Pillar	Reference	Conforming
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Food Safety	2.8.3	Yes
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Clause and Explanation

Clause:

The facility shall also develop and maintain written specifications that include, at minimum, food safety, legality and quality for the items stated in clause 2.8.1.

Explanation:

Specifications were documented. Raw materials specification verified for (SOP/DOC/02a) ;Finished product specification in CCCIII/GMP/01;Specifications for salt CCCIII/DOC/55; for phosphate SOP/29-E; is developed to address the requirements of specifications, developing of specifications and review of specifications.

Pillar	Reference	Conforming
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Food Safety	2.8.4	Yes
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Clause and Explanation

Clause:

The specifications shall be agreed to between the facility and their suppliers, and shall be signed, dated and authorized by appropriate parties.

Explanation:

The specifications were sent to suppliers and were agreed by the suppliers before supplying the materials to the facility. Agreement with facility and supplier (both Raw Materials and General goods) are available on Agreement file verified during audit. The mutually Agreed specification were readily available during audit which were verified. Finished product specifications were agreed with customers through Purchase order.

Pillar	Reference	Conforming
Food Safety	2.8.5	Yes
Clause and Explanation		

Clause:

Specifications shall be kept up-to-date and periodically reviewed, which shall occur at a minimum, annually.

Explanation:

Ref. 2.8.4, Specifications are reviewed once in a year and all the related documents kept by Purchase manager and Factory manager and one additional copy is also kept in quality department for reference. Frequency of specification review is yearly .

Last reviewed on 01.04.2023

Pillar	Reference	Conforming
Food Safety	2.8.6	Yes
Clause and Explanation		

Clause:

Specifications shall be readily available for reference by designated personnel.

Explanation:

Specifications available in Specification File. Specifications are readily available with QA Manager.

Pillar	Reference	Conforming
Food Safety	2.9.1	N/A
Clause and Explanation		

Clause:

The facility shall exercise proper control over any entity that is used to outsource any processes that may have an impact on food safety, legality, quality, traceability and social responsibility. (See Annex 3 regarding traceability and the BAP star status.

Explanation:

Not Applicable. No Outsourced Processes

Pillar	Reference	Conforming
Food Safety	2.9.2	N/A
Clause and Explanation		

Clause:

The facility shall demonstrate control over any outsourced processing service. Control measures shall include but are not limited to: audits to full scope of SPS by the facility or third-party certification to SPS, laboratory testing of outsourced products, and traceability of outsourced products.

Explanation:

Not Applicable. No Outsourced Processes

Pillar	Reference	Conforming
Food Safety	2.9.3	N/A
Clause and Explanation		

Clause:

The control measures over such outsourced processes shall be identified, documented and monitored to ensure compliance with the full scope of the SPS standard, including its Annexes.

Explanation:

Not Applicable. No Outsourced Processes

Pillar	Reference	Conforming
Food Safety	2.9.4	Yes
Clause and Explanation		

Clause:

There shall be a policy statement AGAINST allowing the temporary use of unapproved outsourcing service provider.

Explanation:

The facility has not Outsourced any services from unapproved suppliers. There is a Policy statements available Against the temporary use of unapproved outsourcing service provider.

Pillar	Reference	Conforming
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Food Safety	2.9.5	N/A
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Clause and Explanation

Clause:

The facility shall not outsource the peeling and de-heading of shrimp to informal entities known as “peeling or de-heading sheds”. To be eligible for SPS certification, peeling and/or de-heading of shrimp shall only occur in establishments with valid government approvals and with legal, food safety, environmental and social criteria in place which shall be subject to audits as stated in 2.9.2. Such establishments are either,

- i) owned by the applicant facility or;
- ii) completely controlled by the applicant facility with valid agreements in place or,
- iii) must be located onsite or in close proximity to the applicant facility and included as part of the scope of the annual SPS audit.

(Note: This prohibition cited above does not include processed shrimp that are sourced from a legally approved processing plant subject to controls in clause 2.10.1 or shrimp originating from fishing vessels in compliances with clause 2.8.1.3).

(Note: Peeling or de-heading sheds are defined as independent, third-party "satellite" seasonal operation that engage in peeling or heading of shrimp, often temporarily, during peak harvest times without formal government approval and lack of controls on legal, food safety, environmental and social processes.)

Explanation:

The Facility is not outsource any process related activity and also not purchase any shrimp from unauthorized peeling or de-heading sheds. Complete processing done at the facility's own which is already approved by the regulatory by and also BAP certified. All the production sections of the facility are under the scope of annual BAP audit.

Pillar	Reference	Conforming
Food Safety	2.9.6	N/A

Clause and Explanation

Clause:

The facility shall appoint a designated management person or persons with the authority to approve and/or disapprove outsourced processing activities and each associated service provider.

Explanation:

Not applicable. No Outsourced processing.

Pillar	Reference	Conforming
Food Safety	2.9.7	N/A

Clause and Explanation

Clause:

The facility shall keep an up-to-date list of all entities they are outsourcing processes to, and the specific activity that is outsourced to each.

Explanation:

Not applicable. There is no Outsourced Processes.

Pillar	Reference	Conforming
Food Safety	2.9.8	N/A
Clause and Explanation		

Clause:

Specifications for outsourced processes as described in 2.9 shall be developed by the facility and included as part of a signed contract or service agreement between the facility and the provider. These specifications shall include compliance criteria associated with food safety, quality, legality, traceability and social responsibility. (See also 2.10 - "Supplier Approval and Performance Monitoring").

Explanation:

Not applicable. There is no Outsourced Processes.

Pillar	Reference	Conforming
Food Safety	2.9.9	N/A
Clause and Explanation		

Clause:

Specifications shall be kept up-to-date and periodically reviewed (which shall occur at a minimum, annually). Specifications shall be readily available for reference by designated personnel.

Explanation:

Not applicable. There is no Outsourced Processes.

Pillar	Reference	Conforming
Food Safety	2.10.1	Yes
Clause and Explanation		

Clause:

The facility shall exercise proper control over any outsourced supplier or service that may have an impact on food safety, legality, quality, traceability and social responsibility. There shall be a policy statement that normally disallows the use of unapproved outsourced supplier or service provider.

Examples of commonly used services include, but are not limited to:

- * Pest control
- * Cleaning services
- * Waste removal
- * Laboratory testing
- * Product storage/frozen warehousing
- * Payroll and recruiting services
- * Raw material transfer/delivery services (i.e. tender vessels, shipping courier)
- * Laundry services (for personal protection clothing such as aprons, smocks, rain gear, gloves, etc.)
- * Catering services
- * Calibration services
- * Equipment maintenance and repair

Explanation:

The facility shall exercises proper control over any outsourced supplier or service that may have an impact on food safety, legality, quality, traceability and social responsibility. A policy statement in place that normally disallows the use of unapproved outsourced supplier or service provider.

The facility uses the following service providers

- Pest control-Pest control contract - Innovative - Valid upto 28.02.2024

having licence no: C1/101/2012-13

- Cleaning services - none

- Waste removal- Agreement with M/s Khe [REDACTED] - Dated 7 June 2022 valid for 3 years. Chitin

Manufacturer- APPCB licewnce dated 04.03.2021 valid upto 7 years

- Laboratory testing

- Product storage/frozen warehousing- none

- Payroll and recruiting services - Refer 5.6.4

- Raw material transfer/delivery services (i.e. tender vessels, shipping courier)

- Laundry services (for personal protection clothing such as aprons, smocks, rain gear, gloves, etc.) - none - inhouse laudnry in place

- Catering services - none

- Calibration services

- Equipment maintenance and repair

Pillar	Reference	Conforming
Food Safety	2.10.2	Yes

Clause and Explanation**Clause:**

The facility shall have a supplier approval program which includes a list of approved suppliers and service providers as described in 2.9 above. This list shall be kept up-to-date and reviewed, at a minimum, annually.

Explanation:

Also See 2.8.1

Procedure for Raw material purchase -

Procedure for raw material recieving and acceptance -

Procedure for purchase of raw material other than Raw material -

Procedure for supplier evaluation and Approval -

List of Approved Suppliers verified

Raw Materials

Packaging Materials

Ingredients/additive:

List of Service Providers Verified – CCCIII/DOC/72

Pillar	Reference	Conforming
Food Safety	2.10.3	Yes

Clause and Explanation**Clause:**

The supplier approval program shall include all suppliers described under 2.10.1. The program shall also include criteria for approval, and the facility's policy and/or procedure for temporary use of unapproved suppliers.

Examples of criteria for approval:

- * Suppliers must have traceability systems in place to allow trace-backs to vessel or wholesaler for wild-caught or individual farm for farmed species. (See Traceability, section 9.0)

- * Certification information (where applicable)

- * Certificate of analysis (for certain ingredients or additives)
- * Regulatory Authority Audits
- * Visual assessment (packaging materials)
- * Supplier audit, either by plant personnel or third-party
- * Risk assessment - especially for species with potential toxicity or allergen issues, histamine, molluscan shellfish, chemical contamination, etc.

Explanation:

supplier approval and monitoring procedure is available CCCIII/SOP/07 for Ingredient & Packing Material Purchase & SOP/DOC/02a for Shrimp Purchase. Supplier Approval programme is generally done by Four stages such as 1) Accepting the specification 2) Conduct 2nd party audit 3) Evaluation and 4) Assessment. Ongoing assessment is getting carried out for each supply against the defined scoring criteria and recorded on Supplier Approval doc. Ongoing assessment is taken up per frequency based on risk assessment.

Pillar	Reference	Conforming
Food Safety	2.10.4	Yes
Clause and Explanation		

Clause:

The facility shall have in place a procedure for regularly monitoring the performance of the suppliers including those described in 2.8 and 2.9. This monitoring shall be effective and occur annually, at a minimum. Acceptable performance criteria shall be defined as well as actions to be taken where performance does not meet criteria. The results of the performance assessments and follow-up actions shall be recorded.

Explanation:

Regular monitoring of the Performance of the suppliers and Service providers were Planned. As this is the first year of processing monitoring not started. The approval and monitoring procedure is based on one or a combination of periodic supplier facility audits/third party audits & certification/supplier questionnaire. Also, sample will be taken for antibiotic and chemicals every two months.

Pillar	Reference	Conforming
Food Safety	2.11.1	Yes
Clause and Explanation		

Clause:

The facility shall have a written document control procedure in place that ensures all documents and procedures necessary for compliance with the full scope of the Seafood Processing Standard (including Annexes) are in place and effectively controlled.

Explanation:

A procedure for documentation control is in place

Ref: CCCIII/SOP/04

The master list of documents and records is available. issue and revision status is available and are authorized properly.

Ref: CCCIII/REC/51

Covering the requirement of BAP and other certifications

Along with Quality manual HACCP manual, procedure manual was available.

Master List of Controlled Documents evident and verified. Hard copy of manual is distributed. The distribution list is there for physical copies distributed. The documents are stamped as controlled Document and master documents. Only hard copies are distributed, soft copy is with QA and HACCP team leader with password protected. Doc. No, issue and revision status is available in all documents. These are authorised properly. The Approval of documents, review and amendment of documents and approval of amended documents are defined in the procedure. Master, controlled and

obsolete copies of HACCP, SOP's and SSOP's were seen and all the documents were stamped with Master, controlled and obsolete copies.

Pillar	Reference	Conforming
Food Safety	2.11.2	Yes
Clause and Explanation		

Clause:

The document control procedure shall include how versions are controlled, persons with the authority to modify and authorize them, and measures to ensure outdated or obsolete versions are not used.

Explanation:

The document control procedure specifies how versions are controlled, persons with the authority to modify and authorize them, and measures to ensure outdated or obsolete versions are not used.

Person authorized for approval of Documents is QC Manager

Outdated versions are not used checked and verified all the SOP, SSOP, GMP, QMS, HACCP. Obsolete file verified.

Pillar	Reference	Conforming
Food Safety	2.12.1	Yes
Clause and Explanation		

Clause:

The facility shall prepare and implement standard operating procedures, quality procedures, food safety management procedures, social accountability procedures, and work instructions for all processes and operations having an effect on product safety, legality and quality.

Explanation:

Procedures related to all the processes and functions were in place in the form of SOP's, SSOP's, cGMP, HACCP, Quality Systems Manual, GMP's, Job responsibilities etc. All the procedures were found to be implemented and maintained.

Policies related to food safety and quality, health and safety as well as social policies are in place

Food Safety and Quality Manual -CCCIII/FSMSM/01 dated 01/04/2022 Issue -01, Rev #0

HACCP Manual- CCCIII/M/001 Ver 1.3 dated 01-Apr-2023

cGMP Manual - CCCIII/GMP/001 ver 1.2 dated 02-Jan-2023

SSOP Manual in place with various procedures

Lab Manual - CCC/SOP/LAB

It Includes also food defence and security program.

Pillar	Reference	Conforming
Food Safety	2.12.2	Yes
Clause and Explanation		

Clause:

The facility shall have documented Sanitation Standard Operation Procedures (SSOPs), Good Manufacturing Practices (GMPs), and Hygiene policies and procedures that comply with the standards of both the country in which the facility is located and those countries that receive the final products.

Explanation:

Plant Sanitation, Condition and cleanliness of food contact and non food contact surfaces, Personnel Hygiene, employee Disease Control, prevention of cross contamination, Maintenance of Change room and toilet facilities, protection of food and packaging from adulterants, Labelling Storage and usage of toxic chemicals, pest control, safety of water and ice, master cleaning schedule etc.

Also GMP manual describes requirements related to Current Good Manufacturing Practices 21 CFR 117.

Also HACCP, FSMS Manuals, details material receiving and handling, processing steps and controls, laboratory procedures and analysis, product identification and traceability, corrective action records, internal audit, verification, allergen control, supplier approval. Elaboration of procedure is available in C GMP and SSOP manual

Also refer 2.12.1

Pillar	Reference	Conforming
Food Safety	2.13.1	Yes
Clause and Explanation		

Clause:

The facility shall maintain records that demonstrate the effective control of product and systems to ensure compliance with the full scope of the Seafood Processing Standard (including its Annexes). Electronic records are acceptable provided they are easily accessible during the audit.

Explanation:

Record control procedure documented in Control of Documents & Records CCCIII/SOP/05. All the records were retained for 36 months i.e., shelf life + 1 year and same is documented in Record Keeping procedure. Reviewed Master List of Records. Completed Records are retained in Hard copies under QA Manager Custody.

Electronically saved data protected with password to control the un authorised access All the records are kept in QA department. The completed records are verified in Hard and in soft copies. Electronic Records are saved in PDF and accessible by HACCP Team leader only. Some of the Records

Pillar	Reference	Conforming
Food Safety	2.13.2	Yes
Clause and Explanation		

Clause:

The facility shall ensure that all records are 100% complete, securely stored, and readily accessible when needed.

Explanation:

All the records were 100% complete and securely stored and readily accessible as observed during the audit and as part of the traceability exercise.

Pillar	Reference	Conforming
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Food Safety	2.13.3	Yes
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Clause and Explanation

Clause:

Records shall be retained for a time period required to meet customer or legal requirements. At a minimum this shall be product shelf life plus one year.

Explanation:

All the records were retained for 36 months i.e., shelf life + 1 year and same is documented in Record Keeping . Reviewed Master List of Records (Annexure 1).

Pillar	Reference	Conforming
Food Safety	2.13.4	Yes

Clause and Explanation

Clause:

All food safety, quality, sanitation, and other records shall be filled out according to the frequencies specified in their associated plans (Quality Manual, HACCP plan, SSOP, GMP and Hygiene plans and policies).

Explanation:

.All food safety, quality, sanitation, and other records observed to be filled out according to the frequencies specified in their associated plans (Quality Manual, HACCP plan, SSOP, GMP and Hygiene plans and policies).

Pillar	Reference	Conforming
Food Safety	2.13.5	Yes

Clause and Explanation

Clause:

All monitoring and corrective action records shall be reviewed by an individual other than the person filling them out, and who is qualified to make such evaluations.

Explanation:

Yes. All monitoring records and Corrective action records are complete with duly signed by authorized person. Monitoring and corrective actions records are filled by the concern persons but reviewed by other person especially section Heads. QA Manager is Responsible for the evaluation.

Pillar	Reference	Conforming
Food Safety	2.13.6	Yes

Clause and Explanation

Clause:

All records and other documentation shall be prepared accurately and not show evidence or indication of falsification.

Explanation:

Yes. Records and other documents are properly maintained without any smudging, overwriting etc., where corrections are made, with the signature of person carrying out correction

Pillar	Reference	Conforming
Food Safety	2.13.7	Yes

Clause and Explanation

Clause:

Where local, national, or international government auditing or inspection programs exist, these records shall be made available for review by the GAA auditor.

Explanation:

Regulator Name: EIA dated 29-05-2023

Details of visits: Assessment Report for Additional Facilities / Processing activities

Facility - Steam Cooker - Capacity 15 TPD

Chiller

Activity

Cooked Frozen shrimp ring with cocktail sauce - no production

Raw frozen marinated shrimp- no production till date

Processing of Black tiger shrimp

Findings and closure details:

Pillar	Reference	Conforming
Food Safety	2.13.8	Yes


Clause and Explanation

Clause:

HACCP Records shall be reviewed by a HACCP-trained individual. For the records review of Low Acid Canned Foods (LACFs) product records reviewer must have had a higher level of training, for example; completion of the US FDA Better Process Control School course or equivalent, and who has successfully completed training in the development and application of risk-based preventative controls.

Explanation:

HACCP Trained and experienced individuals are responsible for verifying HACCP.

Details: Food Safety Team Leader Mr. Sre 

No LACF Products at this site

Pillar	Reference	Conforming
Food Safety	2.14.1	Yes

Clause and Explanation**Clause:**

The facility shall ensure that procedures for the determination and implementation of corrective action, in the event of any non-conformity, are prepared and documented. These shall cover the full scope of the SPS Standard (including its Annexes) and shall also address how future reoccurrences will be prevented.

Explanation:

Corrective and Preventive Action Procedure is in place and it details how to correct different deviations occurs in different sections related to Food safety and Quality and all the necessary details of the standard.

Ref:CCCIII/SOP/11

Corrective actions taken for all the nonconformity recorded in CCCIII/REC/44

The action item list included description of the item or issues, investigations or corrections, and verification of the action taken within a specified time frame. root cause analysis and actions taken evident.

NC closures of Previous BAP Audit and Internal audit. Found satisfactory

Pillar	Reference	Conforming
Food Safety	2.14.2	Yes

Clause and Explanation**Clause:**

Non-conformities must be recorded, and it is the facility's responsibility to investigate the cause of the problem(s) and ensure that an adequate response is taken by specified personnel.

Explanation:

Nonconformities were recorded during the Processing and Inspections as well as customer visits. All the Non-conformities related with externals audits and Internal audits are adequately documented and responsible person is QAM to investigate and proper correction.

Pillar	Reference	Conforming
Food Safety	2.14.3	Yes

Clause and Explanation**Clause:**

These actions shall be included in a regular review of activities and systems. If time scales for actions are not met, it is expected that the reason for this is recorded. The review shall include the effectiveness of the action (e.g. whether the action has ensured that similar non-conformities will not occur).

Explanation:

Effectiveness of corrective and preventive actions are discussed in routing meetings as well as in MRM. Non-conformities are closed out within appropriate time scales.

Pillar	Reference	Conforming
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Food Safety	2.15.1	Yes
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Clause and Explanation

Clause:

The facility shall ensure that any product which does not conform to requirements, is clearly identified and controlled to prevent unintended use or delivery. This shall include all products that do not conform to food safety, quality, legality, or customer specification requirements.

Explanation:

A detailed Procedure for Handling of Non-Conforming Product documented in Ref:CCCIII/SOP/12

Procedure includes handling of nonconforming products and storing at designated space in cold store. "Non-conforming Product Area" is available in the cold store to store the nonconforming product.

Non- conforming product was available in the cold room clearing segregated and identified - CPTO Grade 61/70 Code 3F04. Farm ID AP-II-2016 (18211) - AOZ positive (5.560 ppb) - Test report dated 04-06-2023- 70 cartons (9kg bulk)--630 kg net weight. Raw material quantity 954 kg.

Material is clearly identified with Red tape and is pending management decision.

Details Corrections and Corrective action for the Process done. No customer rejection happened in the Previous year.

Responsibility assigned to FS team and Decision making by Managing Director. No nonconforming product verified onsite at time of audit.

Process well understood by staffs that were interviewed during the audit. No major trends. The QA Manager is authorised to release or destruction if any non-conforming product identified.

No FDA detentions, RASSF notifications in the past 1 year.

Pillar	Reference	Conforming
Food Safety	2.15.2	Yes

Clause and Explanation

Clause:

These activities shall be defined in a documented procedure that is securely stored and readily accessible when needed.

Explanation:

Ref. - 2.15.1, Yes. As detailed above. The documents are available with QC department & readily available.

Pillar	Reference	Conforming
Food Safety	2.16.1	Yes

Clause and Explanation

Clause:

The facility shall have a documented procedure that describes how product safety and quality will be maintained in the event of a serious incident such as fire, flood, chemical leaks, extended power outages, and structural integrity issues.

Explanation:

Emergency Preparedness & Response & incident Management Procedures is available Ref: CCCIII/SOP/16 dated 01.04.2022.

Includes Consumer Safety and Quality Incidents. Unit has addressed different incidents (fire, ammonia leak, natural disasters) based on the risk. Mock Fire drill & Ammonia Leakage drill on conducted. The procedure addressing both people safety and product safety. Business continuity Plan in case of emergencies verified in the same. risk .

Business continuity Plan in case of emergencies verified in the same. Mock drill are conducted once in 3 months. Mock drill conducted on 06.09.2023 in production - Electrical Fire in Freezer Electrical area
Also evident for Hostel for both Ladies and Gents dated 02.09.2023. Head count 150 including both males and females.

Pillar	Reference	Conforming
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Food Safety	2.16.2	Yes
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Clause and Explanation

Clause:

Serious incidents that occur at the facility as described in 2.16.1 shall be documented. Records of product handling and disposition during and after the incident shall be maintained. Facility shall also have a description of how business continuity will be maintained in the event of a serious incident. This shall cover at a minimum how product integrity, worker safety and key facility operations will be maintained.

Explanation:

Ref. - 2.16.1, No serious incidences occur at the facility till the date of audit.

Pillar	Reference	Conforming
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Food Safety	2.17.1	Yes
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Clause and Explanation

Clause:

There shall be a written Recall Plan that addresses how product that has been shipped will be identified, located, and recalled in the event of rejection or non-conformity related to food safety, legality or quality. This plan shall also ensure that non-conforming or recalled products are not mixed with others or released inappropriately.

Explanation:

Product Recall Procedure Ref:CCCIII/SOP/15

The product recall and withdrawal procedures are tested once in year. Recall is of three types Class I, II & III. The certification body and regulatory authorities will be informed in 3 working days in case of any product recall as per the SOP.

Pillar	Reference	Conforming
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Food Safety	2.17.2	Yes
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Clause and Explanation

Clause:

The Recall Plan shall list all personnel that are part of the "recall team."

Explanation:

Refer 2.17.1. Recall team of 05 members. Recall team member includes
The Recall team is lead by Senior QA Manager Mr. Sre 

Final decision is taking by the MD.
Contact details evident.

Pillar	Reference	Conforming
Food Safety	2.17.3	Yes
Clause and Explanation		

Clause:

The recall plan shall be tested at a minimum annually through a "mock recall" test. The results of the test shall be documented. The results shall identify, at a minimum: the "mock" incident, identification of all product affected and where it was shipped, how customers that received it were (or would have been) notified, and what percentage of product was successfully identified to be "recalled". Each test shall also record how long the mock recall took.

Explanation:

The mock recall is conducted once in 12 months for different classes (I, II AND III).

Recent Mock recall is conducted dated 12 Sept 2023.

Product Raw Eazy Peel

Mock Incident: High BS Ratio

Batch/Lot Ref: Batch 3F24

Total affected Quantity/units: 415 cartons

Recall team meeting minutes evident.

Communication with buyer evident.

All cases were traced within 58 hours.

100% effective.

Pillar	Reference	Conforming
Food Safety	2.17.4	Yes
Clause and Explanation		

Clause:

The "mock recall" trials shall successfully identify 100% of the product (except for natural wastage e.g. drip and weight tolerances due to the use of tares and equipment accuracy). Corrective action shall be taken for any deficiencies identified in the mock recall or traceability system. These corrective actions shall be documented.

Explanation:

Verified Mock recall termination notices- all products accounted for.

Pillar	Reference	Conforming
Food Safety	2.17.5	Yes
Clause and Explanation		

Clause:

There shall be a procedure that identifies a designated area for recalled product as well as a designated management person for determining disposition or disposal.

Explanation:

Designated area identified in the cold store for the Recalled Products and Non conforming Products. Disposal responsibility Assigned to Recall Cordinator after the Review by the Team.

Pillar	Reference	Conforming
Food Safety	2.18.1	Yes
Clause and Explanation		

Clause:

The facility shall prepare and implement an effective system for the management of customer complaints to control and correct shortcomings in food safety, quality and legality.

Explanation:

Customer complaint handling procedure

Ref: CCCIII/SOP/14

Responsibility is with Factory Manager and HACCP Team. Customer complaint Record verified. No customer complaints received for last one year. Correction and corrective action reports formats verified. No regulatory complaint. No complaint from retailer. No complaints on foreign body. No Food safety Complaints.

No regulatory complaint. No complaint from retailer. No complaints on foreign body. No Food safety Complaints.

Customers complain data is analysed during MRM. No major trend was recorded. Customer feedback form was seen

Pillar	Reference	Conforming
Food Safety	2.18.2	Yes
Clause and Explanation		

Clause:

All customer complaints shall be documented. Records shall include: the nature of the complaint, investigation, product affected, root cause analysis, corrective and preventive action, product disposition where appropriate, and final complaint resolution.

Explanation:

Yes. Ref. - 2.18.1.

Pillar	Reference	Conforming
Food Safety	3.1.1	Yes
Clause and Explanation		

Clause:

All elements of the facility's Food Safety Management System (e.g. the HACCP, GMP, Hygiene, SSOP, Food Defense Plan, and other related plans) shall be documented, implemented, maintained and continually improved.

Explanation:

Policies related to food safety and quality, health and safety as well as social policies are in place
 Food Safety and Quality Manual -CCCI/FSMSM/01 dated 01/04/2022 Issue -01, Rev #0
 HACCP Manual- CCCII/M/001 Ver 1.3 dated 01-Apr-2023
 SSOP Manual
 cGMP Manual - CCCII/GMP/001 ver 1.2 dated 02-Jan-2023 but it is based 21 cfr 110
 Lab Manual - CCC/SOP/LAB
 It Includes also food defence and security program.

Pillar	Reference	Conforming
Food Safety	3.2.1	Yes
Clause and Explanation		

Clause:

The facility's HACCP system shall be systematic, comprehensive and thorough and shall be in compliance with both local and national legislation and the legislation of the countries the facility exports to.

Explanation:

The HACCP system is systematic based on BRCS requirements and SPS 5.1 and also considering Codex guidelines . The hazard analysis is documented in HACCP manual, Range of products processed is covered in Doc:HACCP Manual duly Approved by Factory Manager and Finally Authorized by Managing Director.

Pillar	Reference	Conforming
Food Safety	3.2.2	Yes
Clause and Explanation		

Clause:

The HACCP plan and hazard analysis shall include, at minimum (depending upon the country of operation and the country to which the product will be exported), at least those hazards identified by Codex Alimentarius, or the USFDA's "Fish and Fisheries Products Hazards and Controls Guide" (aka "FDA Hazards and Controls Guide"), current edition. Where local or export country(ies) requirements are stricter, those requirements shall prevail. In the absence of specific legislation or guidance for local or export country(ies), the hazards defined in the aforementioned "FDA Hazards and Controls Guide" shall become the default position to which all facilities shall comply.

Explanation:

Facility developed their HACCP in line with Codex Alimentarius and Fish & Fishery Products; Hazards and Control guidance June 2022 Edition. A copy of the document was on hand. Same also verified while reviewing the HACCP refer 3.2.1. Hazard analysis is conducted for all process, Product and raw materials. HACCP System is systematic, comprehensive and thorough and includes allergens (sulphite, shrimp). Range of products processed is covered in Doc: HACCP manual duly authorized by Managing Director.

Pillar	Reference	Conforming
Food Safety	3.2.3	Yes

Clause and Explanation**Clause:**

The scope of the HACCP system shall be defined per product, per process line/or process-location. It shall include verified process flow diagram(s), the description of the product and its presentation(s), intended use, and method of distribution. The accuracy of the process flow diagram shall be verified, at a minimum, annually by all members of the HACCP team.

Explanation:

The Scope is defined based on the product and process, team

is formed, product description, intend use and process flow diagram in HACCP Manual is available and verified onsite by HACCP team.

Records of Onsite verification of flow diagrams evident for Headles block on 19 Aug 2023

Frozen Raw peeled - 16 -June 2026

Cooked IQF - June -2023

Pillar	Reference	Conforming
Food Safety	3.2.4	Yes

Clause and Explanation**Clause:**

All facilities shall apply the seven HACCP-principles to the HACCP System.

Explanation:

Facility developed their HACCP in line with Codex Alimentarius and Fish & FisheryProducts; Hazards and Control guidance June 2022 Edition. The seven HACCP principles have been logically applied.

The company has HACCP plans for Frozen Raw IQF Shrimps, Frozen Raw block shrimps. HACCP team have identified the critical control points. The Hazard analysis has been carried out on the basis of knowledge of experienced professionals, recognised EU and USFDA guidelines, local regulatory body –EIA guideline/notification, Customer requirements as well as scientific institutions information were evident. All the possible physical, chemical(Aqua cultural drug, pesticide, sulphite, allergen,) and biological hazards(TPC, E. Coli, Salmonella, Listeria monocytogenes,V. Cholera, V. Parahaemolyticus, Staphylococcus aureus Clostridium toxin), have been identified for all process steps, by HACCP team , Hazard analysis has been done based on likely occurrence (rated – L-M-H) and severity (rated – L-M-H) of the identified hazards and control measures has been established , documented in Hazard Analysis work sheet.

A decision tree has been used to identify CCP.

Pillar	Reference	Conforming
Food Safety	3.2.5	Yes

Clause and Explanation**Clause:**

All Critical Control Points (CCPs) shall be properly identified and procedures accurately followed in order to control or prevent hazards.

Explanation:

The CCPs identified are as follows:-

CCP# 1- Receipt of raw material- shrimp without sulphite (For sulphite CL less than 10 ppm and supplier declaration, For Head on raw shrimp CL less than 100 ppm, Monitoring for every lot, CA- rejection of material for antibiotic CL supplier declaration & antibiotic screening report). Monitoring visual inspection for supplier declaration and presence of sulphite is

through testing kit frequency each received lot. QC Raw material evaluation Report –SOP/QC/17.
 CCP#2 Metal Detection (CL- Fe-1.5mm, NonFe-2.0.mm, S.S- 2.5mm). Monitoring during start & end, and every 30 minutes. CA- material holding, re-screening, rejection of contaminated product. Metal detector monitoring included in the Online Process Monitoring Report (CCP Record)– Cooked IQF FMT/QC/08.
 CCP-#3 Cooking (CL- Cooking time & temperature as per validation studies to attain product core temperature for 6 D reduction of Listeria, cooker temperature 85 degree C). Monitoring of cooker temperature, and time for every batch lot. CA- re-cooking.
 CCP# 4 Label checking during packing for Allergen hazard- (CL- presence of label declaration shrimp/prawn/crustaceans, sulphite when more than 10 ppm), start, during product change and every 60 minutes. CA- product hold, label correction and re-labelling. Packing & Labelling monitoring in Online Process Monitoring Report (CCP Record)– Cooked IQF FMT/QC/08.
 Corrections and corrective actions identified for each CCP Violation in CCP Plan in the HACCP Manual.
 Corrective and preventive action procedure is defined in SOP/43
 Records verified as part of traceability exercises and also verified during audit.

Pillar	Reference	Conforming
Food Safety	3.2.6	Yes
Clause and Explanation		

Clause:
 The HACCP plan and hazard analysis shall include a list of all allergens present at the facility, including the various species of seafood handled, and each species must be identified by their scientific name. All allergens shall be effectively controlled throughout receipt, storage, handling and use.

Explanation:
 Risk assessment for allergens – is done as part of HACCP.
 All Species processed are identified by Scientific Name
 Allergen risk from raw material, additives, lubricants, and process has been considered during hazard analysis and control measures are established. List of allergens handled by the facility is available and they are Crustacean (shrimp). Allergen (sulphite) risk through raw material has been considered during hazard analysis and control measure is established. Sulphite treated shrimp is rejected at receiving point (limit below 10 ppm) every received lot is screened for the presence sulphite. No other special handling is required. The Allergen Risk is declared in the Final Label and the same is controlled as CCP.

Allergen control training - Allergen control dated 07.10.2023 for 105 personnel

Coverage of all food handlers is ensured at least once in a year for the same

Pillar	Reference	Conforming
Food Safety	3.2.7	Yes
Clause and Explanation		

Clause:
 In addition to the requirements stated in 3.2.6, the facility shall demonstrate that they have adequately labeled the presence of allergens. The HACCP plan must address how the facility will label the presence of allergens in the finished product.

Explanation:
 Labelling for allergen hazard.- Label checking during packing in master cartons for Allergen hazard (CL- presence of label declaration shrimp, monitoring every production lot (At starting and continuous monitoring online). CA- Product hold, correction in label. –

Pillar	Reference	Conforming
Food Safety	3.2.8	Yes
Clause and Explanation		

Clause:

All critical limits set at each CCP shall be properly determined and followed. Critical limits shall be based on validated processes, industry standards or scientific and regulatory guidance.

Explanation:

All critical limits set at each CCP have been properly determined and followed. Critical limits are based on validated processes, industry standards or scientific and regulatory guidance.

Details:

Refer 3.2.5.

ICAR - Central Institute of Fisheries Technology - F. No. 2-104/2022-QAM, dated: 14.07.2022, Test report no. 0054 (Non – NABL), Shrimp Samples, 17 No's, Thermal Validation report, data and graph attached.

TC-1, TC -2, TC 3, TC 4, TC 5, TC 6, TC 7, TC 8

ICAR – Central Institute of Fisheries Technology – F. No. 2-104/2022-QAM, dated: 30.05.2023, Test report no. 0023 (Non – NABL), Shrimp Samples, 22 No's, Thermal Validation report, data and graph attached.

TC-1, TC -2, TC 3, TC 4, TC 5, TC 6, TC 7, TC 8

Internal Validation reports verified. IQF Freezer validation CCCIII/REC/32 is done by internal HACCP team dated: 10.01.2023 variety used for study HLSO/ PDTO/PD vannah of different grades. Cooker validation done by External (CIFT) on 12.07.2022 verified.

Pillar	Reference	Conforming
Food Safety	3.2.9	Yes
Clause and Explanation		

Clause:

Monitoring procedures adequate to control each hazard at each CCP shall be developed and documented in the HACCP plan. These procedures shall include the monitoring frequency, methods, responsible employees, and associated records.

Explanation:

Yes, Adequate procedure for Monitoring in HACCP Plan are adequate. Details frequency of monitoring as per as schedule, allocation of task & responsibility to the concern person, monitoring process & methodology and appropriate record keeping are properly maintained by the facility, checked and verified during the audit. Refer 3.2.5

Pillar	Reference	Conforming
Food Safety	3.2.10	Yes
Clause and Explanation		

Clause:

The facility shall identify in the HACCP plan, corrective actions that shall be taken any time a critical limit is not met at any CCP. The corrective actions taken shall be documented. The corrective actions shall include product disposition, as well as root cause and future prevention. (Reference also clause 2.15 "Control of Non-Conformity").

Explanation:

Yes. The HACCP plans identify the corrective actions and records associated with their respective CCPs. Documented SOP procedure and Corrective action records was evidenced and verified during the day of audit where the non-conformities, root cause, corrective action plan and corrective action taken are adequately captured for verification..

Pillar	Reference	Conforming
Food Safety	3.2.11	Yes
Clause and Explanation		

Clause:

A properly functioning metal detector or x-ray machine shall be in place to check all frozen finished product unless the facility can demonstrate, through hazard analysis in its HACCP Plan, that it is not reasonably likely to expect that metal fragments could enter the food.

Explanation:

There are 3 Functional Metal detectors were evidenced in the Packing area with Test pieces (Same Sensitivity), in place to check all frozen finished products. The working of MD challenged by test pieces during Site Visit. Found Satisfactory

Pillar	Reference	Conforming
Food Safety	3.2.12	Yes
Clause and Explanation		

Clause:

Facilities shall include in the hazard analysis, potential hazards from environmental contaminants at the farm or harvest sites they purchase from. This includes chemicals, pesticides or heavy metals that may originate from industrial or agricultural operations near the producing farm or harvest sites.

Explanation:

Hazard analysis done. The environmental contaminants identified as hazards in the RM Receiving Section and considered as CCP #1. Controls verified in Hazard analysis worksheet and Plan. Refer 3.2.5.

Pillar	Reference	Conforming
Food Safety	3.2.13	Yes
Clause and Explanation		

Clause:

The HACCP plan shall include monitoring at reception (i.e. receiving) for residues of the aquaculture drugs listed in Annex 4, Table II as appropriate for the species.

The facility shall collect 1 sample per receiving lot. (See Annex 1 Glossary for the definitions of "Receiving Lot - Farm Suppliers" and "Receiving Lot - Plant Suppliers").

The facility must have a well-documented testing program in place. Where this program deviates from that specified above (1 sample per receiving lot) the facility must demonstrate that this is based on risk assessment or historical analysis of test results. Refer to Annex 4 Guidelines for testing requirements for details and clarification on reduction of requirements.

(Note: Tests may be performed by qualified in-house laboratories or by use of third-party labs.)

Explanation:

HACCP Plan is included the monitoring for residues of aquaculture drugs while receiving of raw materials in lot wise. Sampling plan in Lab Manual and procedure also prepared as required to BAP annexure 4, table II & III, checked and verified. The facility is regularly testing (In-house) for all parameters as per the BAP Annexure 4, Table II & III from each lot (composite sample as per as BAP requirement) of raw materials while receiving, by ELISA (ELISA Testing File) and testing is done by approved technologists from EIA. They also undergone the Antibiotic testing programme. In - House ELISA Test Report verified and found satisfactory.

Test report form ITC Analytical Services NABL TC-5459 dated 20-09-2023 for Raw material Vannamei Shrimp – as per Annex IV – once in two months.

Test report also available dated 04-07-2023

Pillar	Reference	Conforming
Food Safety	3.2.14	Yes
Clause and Explanation		

Clause:

Antibiotics or chemicals that are proactively prohibited in the producing or importing country shall not be used in feeds or any other form of treatment. Further, the facility shall include in their HACCP plan, testing for other approved and unapproved and/or banned drugs at reception, beyond those listed in Annex 4, Table II, where compliance with local or country of export laws or buyer specifications require it. (Refer to Standard 1 - "Regulatory Management" system requirements).

Explanation:

Antibiotics or chemicals are not allowed to use by the farmers and it is checked regular basis before harvesting and while receiving as per as BAP sampling protocol. If test result detected for using aquaculture drugs, materials are rejected and prohibited the supplier from the approved supplier list. Documented procedure of sampling plan is available for testing of banned or unapproved chemicals or drugs beside the BAP annex 4 Table II (SPS-5.1) are also included in the HACCP Plan. Facility done the risk analysis on HACCP Plan and accordingly Hazard Analysis being carried out for all potential aquaculture drugs (HACCP Documents and In-house ELISA testing results as well as external Laboratory test reports) (External Test Reports consignment wise) also verified and found satisfactory.

Pillar	Reference	Conforming
Food Safety	3.2.15	N/A
Clause and Explanation		

Clause:

For Re-processors: Processors in this category that receive processed product from a Primary (first) processor, compliance with clause 3.2.13 is required in one or more of the following ways:

- A. Address the hazard in the hazard analysis and conduct testing at reception;
- B. Address the hazard in the hazard analysis and justify, where the conclusion is that the primary processor must control it, how that is to be assured (i.e. incorporate the requirement for them to test as part of the Purchasing specifications and Supplier Approval and Performance Monitoring requirements in sections 2.8 and 2.10). Test reports shall be obtained from the primary processors.

Explanation:

Not Applicable. Not a Reprocessor.

Pillar	Reference	Conforming
Food Safety	3.3.1	N/A
Clause and Explanation		

Clause:

Facilities producing Thermally Processed Low-Acid Foods Packaged in Hermetically Sealed Containers (referred to as LACFs) shall be compliant with US FDA or equivalent regulations in both country of origin and the countries of export governing processing of these products.

Explanation:

: Not Applicable. No LACF

Pillar	Reference	Conforming
Food Safety	3.4.1	N/A
Clause and Explanation		

Clause:

Facilities producing cured, salted, and/or smoked products shall apply the guidelines for such products as specified in the AFDO Code for Cured, Salted, and Smoked Fish or equivalent in both country of origin and the countries of export.

Explanation:

Not Applicable. No Cured,salted or smoked fish.

Pillar	Reference	Conforming
Food Safety	3.5.1	Yes
Clause and Explanation		

Clause:

The HACCP Team shall meet regularly to review HACCP compliance and assess the need for plan revisions. The team shall consist of appropriately qualified multi-disciplinary personnel (i.e. operations, quality assurance, and engineering/maintenance, at the very least) with a designated team leader defined. Such reviews shall be conducted to assess effectiveness and shall be conducted in advance of any change in the product, processes, ingredients, etc. that may have an impact on food safety. Records of these meetings shall be kept. Where there have not been any changes, such meetings and plan assessments shall occur at minimum annually.

Explanation:

Frequency of HACCP review is Once in 12 months or whenever any significant change.
HACCP Review last done 01-04-2023. (CCCIII/REC/96)

Including PRP review.

The HACCP team is involved in the Review and signature was available for the attendance.

Pillar	Reference	Conforming
Food Safety	3.5.2	Yes
Clause and Explanation		

Clause:

Such a review shall also evaluate the need for changes to other components of the facility's food safety management system, including but not limited to specifications, outsourced activities, supplier performance monitoring, food safety policy and food safety objectives. Usage of chemicals shall also be reviewed to ensure that such usage conforms to the regulations of both the country where production occurs, and the country to which the products will be exported.

Explanation:

There is no change in existing product form and FSMS implementation so no change is suggested in existing HACCP plan & food safety management system.

Pillar	Reference	Conforming
Food Safety	3.6.1	Yes
Clause and Explanation		

Clause:

The facility shall have a documented food fraud vulnerability assessment procedure (VACCP Vulnerability Assessment Critical Control Points) in place to identify potential vulnerability and prioritize food fraud mitigation measures.

Explanation:

Product authenticity & Vulnerability assessment procedure verified
Ref: CCC/III/DOC/64 last reviewed in 01-04-2023.
Mitigation measures in place.
Details- Approved supplier, transported under lock and key etc.

Pillar	Reference	Conforming
Food Safety	3.6.2	Yes
Clause and Explanation		

Clause:

The food fraud plan and risk assessment shall be reviewed, at minimum, annually.

Explanation:

Product authenticity & Vulnerability assessment procedure verified
Ref: CCC/III/DOC/64 last reviewed in 01-04-2023.
Mitigation measures in place.
Details- Approved supplier, transported under lock and key etc.

Pillar	Reference	Conforming
Food Safety	3.6.3	Yes
Clause and Explanation		

Clause:

The facility shall have a documented plan in place that specifies the measures the organization has implemented to mitigate the public health risks from the identified food fraud vulnerabilities including those that might arise due to outsourced activities.

Explanation:

There is no Outsourced activities which will leads to food Fraud issues. Still Procedure is established in Manual verified.

Pillar	Reference	Conforming
Food Safety	3.6.4	Yes
Clause and Explanation		

Clause:

The facility's Food fraud mitigation plan shall be supported by the organization's Food Safety Management System.

Explanation:

There is no Outsourced activities which will leads to food Fraud issues. Still Procedure is established in Manual verified.

Pillar	Reference	Conforming
Food Safety	3.7.1	Yes
Clause and Explanation		

Clause:

The facility shall have a documented risk assessment system and procedure (TACCP - Threat Assessment Critical Control Points) in place to identify and address food defense risks. This shall be established, implemented and maintained to prevent, reduce or eliminate these risks and shall be included in the facility's Food Safety Management System. The Food Defense plan and risk assessment shall be reviewed, at minimum, annually. (Note: Food Defense risks are facility security/sabotage related. For instance: tampering or adulteration of product or the water supply by entry of unauthorized personnel, entry by disgruntled or terminated employees, uncontrolled access to storage areas, or access to and misuse of toxic compounds in the facility).

Explanation:

Documented risk assessment system and procedure (TACCP - Threat Assessment Critical Control Points) in place to identify and address food defense risks- Threat assessment and Mitigation Plan CCCIII/DOC/50
Procedure for Food defence and Biosecurity Programme in CCCIII/SOP/17
, dated 01/04/202
Visitor Policy CCCIII/DOC/69 dated Visitor Declaration CCCIII/REC/62 verified

Security Audit (CCCIII/REC/41A) is done on
Food Security Plan Management Checklist - CCCIII/REC/61

Last Reviewed on:

Specific food defence measures

Raw water and water treatment area, Microbiology lab, storage of non-food chemicals, - locking, restricted access

Transportation of finished products - tamper proof seals

Incoming raw material- inspection and testing

Terminated employees- restriction, getting back employee identity cards, e-mail access, etc.

Plant is well equipped with CCTV camera (62 Nos) in each section and monitored by Production Manager and Factory manager.

Pillar	Reference	Conforming
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Food Safety	3.7.2	Yes
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Clause and Explanation

Clause:

Employee members responsible for the implementation of the food defense plan (the "food defense team") shall be clearly identified in the document. They must demonstrate sufficient knowledge in this area to ensure the effective implementation of the food defense plan. The food defense team must ensure that the mitigation strategies are assessed to verify that the food defense plan is being effectively implemented.

Explanation:

Food defence team in place and verified

Led by Mr. Sre [REDACTED]

The food defense team ensures that the mitigation strategies are assessed to verify the implementation of the food defense plan.

Pillar	Reference	Conforming
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Food Safety	3.8.1	Yes
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Clause and Explanation

Clause:

The facility shall have in place an effective pest control program/system that prevents and controls risk of pest infestation and harborage areas inside the facility and on facility grounds. Pest control shall be performed by either a licensed third-party or properly trained personnel within the facility. Chemicals used in food facilities shall meet at minimum US EPA standards or equivalent.

Explanation:

Pest control contract - Innovative - Valid upto 28.02.2024

having licence no: C1/101/2012-13

Operators - G. Ve [REDACTED] - Training record - 03 Aug 2023.

Approved Cehmicals are used e.g. Flies control Acetamiprid 20%SP/ Approved by CIB vide Regn No. CIR,38,190/2002 (219)/Acetamiprid (SP) -22 and also Alphamethrin

also verified use of the same dated 05.10.2023 - FMT/PC/02. - ServiceRecord - Flies/mosquitoes/spider/lizards

Pillar	Reference	Conforming
Food Safety	3.8.2	Yes
Clause and Explanation		

Clause:

Litter and discarded equipment shall be properly disposed of to avoid the creation of pest harborage areas.

Explanation:

Litter & Scrap is properly stored and timely disposed off to waste contractor and prevents any habitats for pest. No accumulation of discarded equipment or litter seen during plant visits. Covered under routine maintenance, internal audits. Immediate surroundings of process building were found properly maintained.

Pillar	Reference	Conforming
Food Safety	3.8.3	Yes
Clause and Explanation		

Clause:

Windows, doors, walls and other openings to the outside of the facility shall be adequately sealed, screened or covered to exclude pests. In addition, facilities shall ensure all proper steps are taken to prevent pest entry through effective building design, maintenance, operational procedures and employee training.

Explanation:

Building is designed to minimise the external openings, and the openings found guarded with fly proofing nets. Strip curtains and Air Curtains were found used in the Doors and Chutes.

Pillar	Reference	Conforming
Food Safety	3.8.4	Yes
Clause and Explanation		

Clause:

There shall be a sufficient number of pest traps at appropriate locations.

Explanation:

Bait Map Verified. Last updated on 01.04.2023 32 Rodent bait stations. 15 Glue traps and 14 nos of fly Catcher devices are installed. Regular Monitoring Records verified. Refer 3.8.1

Pillar	Reference	Conforming
Food Safety	3.8.5	Yes
Clause and Explanation		

Clause:

All pest traps (electronic, baited, etc.) shall be located so as not to contaminate food-processing areas. Poison bait traps shall not be located inside food production or storage areas.

Explanation:

Poison baits were not used inside the Processing area. Mechanical traps evidenced. External baitstations verified. Bait stations are located so as not to contaminate food-processing areas

Pillar	Reference	Conforming
Food Safety	3.8.6	Yes
Clause and Explanation		

Clause:

The facility shall have a program for pest trap inspection that includes a map of trap locations, regular cleaning and records of pests caught.

Explanation:

Bait Map Verified. 32 Rodent bait stations. 15 Glue traps and 14 nos of fly Catcher devices are installed. Regular Monitoring Records verified. Refer 3.8.1

Pillar	Reference	Conforming
Food Safety	3.8.7	Yes
Clause and Explanation		

Clause:

Pest control inspections shall be assessed and analyzed for trends on a regular basis, at a minimum annually. The results of the analysis shall be used for improvements in pest control systems.

Explanation:

Pest control audit report by contractor evident - dated 27-12-2022
Trend analysis verified for the months from sept 2022 to Aug 2023.

Pillar	Reference	Conforming
Food Safety	3.8.8	Yes
Clause and Explanation		

Clause:

All pest traps identified on the pest control map in and around the facility and in storage areas shall be in place and fully functional.

Explanation:

All of the bait stations found functional during site visit.

Pillar	Reference	Conforming
Food Safety	3.8.9	Yes
Clause and Explanation		

Clause:

Processing and primary storage areas in the facility shall show no evidence of pests or pest activity (insects, rodents, birds, dogs, cats, feces, urine, etc.).

Explanation:

No evidence of Pest activities in the Storage areas and Surroundings.

Pillar	Reference	Conforming
Food Safety	3.8.10	Yes
Clause and Explanation		

Clause:

All items stored in warehouse areas shall be placed on pallets above the floor and away from walls. All food ingredients and packaging shall be stored in clean areas free of dust and debris and covered and protected from pests and other contaminants.

Explanation:

Materials stored in Boxes on SS Pallets away from Walls and with proper protection. Packing Materials are stored on pallets above floor, away from walls, with moving space between each row and covered with polythene sheets.

Pillar	Reference	Conforming
Food Safety	3.9.1	Yes
Clause and Explanation		

Clause:

The facility's grounds and outside areas shall be maintained to prevent worker safety hazards, and environmental, hygiene and pest harborage risks. This shall include proper drainage, and elimination of shrubs, high grass, equipment and other materials close to the facility.

Explanation:

Ground and outside areas kept clean and tidy. Entire premises is concreted.. External areas are well maintained. No puddles or muddy areas observed at immediate surroundings of process and storage building through proper drainagesystem, regular monitoring the plant premisses

Pillar	Reference	Conforming
Food Safety	3.9.2	Yes
Clause and Explanation		

Clause:

All food contact areas shall be constructed of food grade materials. Bare wood, cloth, corrosive or flaking materials or other non-food grade substances are prohibited.

Explanation:

All Food contact areas are constructed with food grade materials verified during audit. Wooden Things, cloths, corrosive materials are not used in processing plant. Processing equipments are made of either stainless steel or plastic bins where appropriately used.

Pillar	Reference	Conforming
Food Safety	3.9.3	Yes
Clause and Explanation		

Clause:

Restrooms and other personal hygiene areas shall open directly into transition areas with proper sanitation controls and not directly into processing areas inside the plant.

Explanation:

Yes. Restrooms and other personal hygiene areas open directly into transition areas with proper sanitation controls. Toilets open into change room or transition area with proper sanitation control which are not directly into processing areas

Pillar	Reference	Conforming
Food Safety	3.9.4	Yes
Clause and Explanation		

Clause:

Internal floors and walls shall be made of a smooth, impermeable material that can be readily cleaned and sanitized.

Explanation:

Yes. Internal walls and floors are made of smooth, impermeable material (Tiled with smooth stones) and are readily cleaned and sanitized.

Pillar	Reference	Conforming
Food Safety	3.9.5	Yes
Clause and Explanation		

Clause:

The corners between the walls and floors shall either be rounded, or properly sealed and maintained to prevent the accumulation of waste and contaminants.

Explanation:

Corners are rounded, and same was found maintained well and no accumulation of waste or water observed in the Processing areas.

Pillar	Reference	Conforming
Food Safety	3.9.6	Yes
Clause and Explanation		

Clause:

Floors of the facility shall have adequate drainage, including during peak water volumes, to avoid pooling and the accumulation of waste and contaminants.

Explanation:

Yes. Proper internal drainage is available with appropriate slope and no water puddling or accumulation of waste observed.

Pillar	Reference	Conforming
Food Safety	3.9.7	Yes
Clause and Explanation		

Clause:

The facility shall maintain sufficient separation of space between finished and unfinished products to prevent cross contamination.

Explanation:

Yes. Pre-processing and processing (Finished Products), packing area are physically separated in different sections

Pillar	Reference	Conforming
Food Safety	3.9.8	Yes
Clause and Explanation		

Clause:

All equipment shall be designed, installed, constructed, and used to prevent product contamination.

Explanation:

Equipments placed with space, and are made of stainless steel and designed for proper cleaning and maintenance, no breakage or aberration etc. which helps to prevent product contamination.

Pillar	Reference	Conforming
Food Safety	3.10.1	Yes
Clause and Explanation		

Clause:

An effective maintenance program, including preventative maintenance, shall be in place and documented. This program shall include walls, floors and all items of equipment and other food contact surfaces critical to product quality and safety. The program shall include at a minimum: A. An itemized list of items and areas to be maintained B. A preventative maintenance schedule C. Records of inspections and maintenance performed.

Explanation:

Maintenance Records of Cooker -1 and 2- Daily maintenance -
 Calibration certificate from Laitram - Cooke RTD - dated 04-04-2023 and due by 04-03-2023.
 Verified Service reports . Issues with RTD rectified.
 Inhouse Temperature validation - Quarterly for all zone s in place.
 Water Treatment plant - UV light change records- on 23.06.2023. Devu Enterprises. 8000 hrs life.
 Breakdown Register - CCCIII-FMT-QR-MNT-04 - datted 22-Sept-2023 - calibration issue - recitified no parts - i hour. post hygienic cleaning checks evident.

Pillar	Reference	Conforming
Food Safety	3.10.2	Yes
Clause and Explanation		

Clause:

There shall be a foreign materials prevention program (or series of separate programs), that prevents contamination from all forms of foreign material. Including but not limited to paint, wood, glass, plastic, metal, hair, rust, etc.

Explanation:

Glass policy and Brittle Plastic policy covered in Foreign material control Policy (CCCIII/DOC/70) Regular Monitoring of glass and hard plastic is documented on SOP/QC/14 and in HACCP Manual. Jewellery policy and personal hygiene policy also verified.

Pillar	Reference	Conforming
Food Safety	3.10.3	Yes
Clause and Explanation		

Clause:

All overhead lights in food production and primary storage areas shall be shielded or made of shatterproof material to prevent glass contamination of product from broken bulbs.

Explanation:

Overhead lights are shielded with shatter proof covers to prevent glass contamination of product from broken bulbs as

describe in the procedure of Glass Policy . Regular Monitoring of glass and hard plastic is documented Monitoring records are updated.

Pillar	Reference	Conforming
Food Safety	3.10.4	Yes
Clause and Explanation		

Clause:

The facility shall provide sufficient lighting to properly carry out processing activities.

Explanation:

Sufficient lighting is provided to carry-out processing procedures. Sufficient lighting is provided in warehouse also.

Pillar	Reference	Conforming
Food Safety	3.10.5	Yes
Clause and Explanation		

Clause:

The roofs of food production, food packaging, ingredients and chemical storage areas shall be maintained. There shall be no evidence of leaks, mold, rust or flaking paint.

Explanation:

The roofs of food production, food packaging, ingredients and chemical storage areas as per the BAP requirement. There is no evidence of leaks, mold, rust or flaking paint.

Pillar	Reference	Conforming
Food Safety	3.10.6	Yes
Clause and Explanation		

Clause:

Painted surfaces in food production and primary storage areas shall be in good condition and free of chipping or flaking.

Explanation:

Wall was found properly maintained through maintenance schedule, chipping or peeling of paint was not evidenced.

Pillar	Reference	Conforming
Food Safety	3.10.7	Yes

Clause and Explanation**Clause:**

All floor surfaces in food production and primary storage areas shall be in good condition, and free of significant cracks or gouging. Where minor damage exists, the floor shall show that attempts to properly keep up with the maintenance are being made through evidence of repair and appearance on a regular maintenance schedule.

Explanation:

Floor surfaces in production and primary storage areas are in good condition without any cracks or break evidence of regular maintenance in all the area.

Pillar	Reference	Conforming
Food Safety	3.10.8	Yes
Clause and Explanation		

Clause:

All food contact surfaces, including equipment and utensils, shall be in good condition and free of cracks, pits, gouging and abraded areas.

Explanation:

Tables & Freezer Belts handling finished products are in good condition. Checked the table tops and corners and utensils surfaces are smooth without any aberration. Undergo routine cleaning and sanitizing and also periodic maintenance.

Pillar	Reference	Conforming
Food Safety	3.11.1	Yes
Clause and Explanation		

Clause:

Work surfaces that come in contact with food products (tables, equipment, utensils, employee gloves and clothing) shall be in good condition and adequately cleaned and sanitized before use. This includes walls in production and food storage areas which shall be kept clean and free of fungal growth.

Explanation:

Premises and Equipment found Generally Clean. Product Contact surfaces found in Clean and good condition. Cleaning is done by in-house cleaning team of 15 personnel. Thorough cleaning is done every day before production for process area equipment with soap solution, sanitisation with 50 ppm chlorine for food contact surfaces. 100 ppm for foot washing, 20 ppm for hand cleaning Drains, floors - 200 ppm used. Cleaning with water is done for the equipment's after completion of production.

The surroundings and Processing area found Clean. Work surfaces found in Clean and good condition.

Pillar	Reference	Conforming
Food Safety	3.11.2	Yes

Clause and Explanation**Clause:**

Facilities shall maintain a written SSOP that details cleaning frequency and designates implementation and verification responsibilities. The SSOP shall include a risk-based environmental monitoring program for assessing the effectiveness of all cleaning and sanitizing activities that includes all high-risk areas

Explanation:

Yes Procedure and plan available as defined in 3.11.1. Details Job Description, Frequency, assigned to section Supervisor and verification by QC personnel as per the scheduled. Effectiveness of Cleaning verified by Swab analysis. Risk assessment verified.

Pillar	Reference	Conforming
Food Safety	3.11.3	No - Minor

Clause and Explanation**Clause:**

Planned and frequent microbial analyses (aka "swab tests", ATP or protein residue tests) of food contact areas shall be carried out after cleaning and sanitizing to verify the adequacy of the sanitation regime.

Explanation:

Environmental Monitoring Policy and Swabbing Procedure CCCIII/EMP/01 dated 01.04.2022 is based on risk.

The facility is divided in to Zones based on proximity/risk to product - Environmental Monitoring Schedule -2023 evident Zone 1 -Direct/indirect Product Contact Surfaces(PCS) - Zone 1 - RM Washing machines, conveyors,, utensils etc. Min sampels 12/month

Zone 2 Areas adjacent to Zone 1 - conveyor frames, equipment handles, shields and guards, controller buttons, etc. 24 samples/month

Zone 3 - Non -Product Contact within protected areas - drains, walls, undersides of tables and quipment, hollow legs of equipment, pallets etc. 8 samples/month

Zone 4 - Outside protected areas - Break rooms, rest rooms, change rooms etc. 8 samples/month

Parameters - TPC (limit 100 cfu/cm square), colifroms, Y&M, E.coli, Salmonella and Listeria

Hand swabs - minimum 100 samples/month - TPC, S.aureus

Environmental Swab Testing Record - Sanitary Samples analysis register CCC-III/OPRP/QC/01- on 30-09-2023 - for the month of Aug and Sept 2023.

Air monitoring of Cooking Section - is done whenever production happens- e.g. dated 20.04.2023

Mechanical hand drier also included in the schedule. report verifed dated 30.09.2023

Minor NC

Environmental Monitoring Policy and Swabbing Procedure CCCIII/EMP/01 dated 01.04.2022 is based on risk. As per the program minimum 100 hand swabs are to be taken every month on an average. However, as per records less than 50 samples are tested in a month

Pillar	Reference	Conforming
Food Safety	3.11.4	Yes

Clause and Explanation**Clause:**

All records of verification analyses required under 3.11.3 shall include total or standard plate count, Staphylococcus aureus, Listeria monocytogenes (for RTE processing only), Salmonella spp. (for RTE processing only), and total coliforms at minimum. These records shall reflect consistent effort to improve sanitation, as evidenced by analyses of trends in microbiological counts over time.

Explanation:

The Sanitary Sample analysis (CCCII/OPRP/QC/01) for the Sanitation verification done. Sampling Plan verified. Verification done for TPC, Coliforms, Staphylococcus & VC. Salmonella & Listeria also analysed for High risk area. analysis been performed in the Sanitation verification analysis. Reports found satisfactory. Sampling Frequency every days.

Pillar	Reference	Conforming
Food Safety	3.12.1	Yes

Clause and Explanation

Clause:

The facility shall have a documented personal hygiene standard and program that prevents product contamination that, at a minimum, includes the below elements and other related elements of this standard - as well as additional measures as appropriate based on risk.

Explanation:

Documented Personnel hygiene policy on CCCIII/DOC/68, Personnel hygiene practice was found satisfactory during audit site visit. Personal hygiene requirements are recorded in Personal Hygiene Checklist SSOP/PD/04. Training on personal hygiene is provided Instructions are displayed at entry points. Daily hygiene checking is done by Q.C representative. Personnel with cuts or wounds are not allowed in open food area

Pillar	Reference	Conforming
Food Safety	3.12.2	Yes

Clause and Explanation

Clause:

If local laws require regular health examinations of employees, records that report exam results shall be available for all workers in food production and packing areas.

Explanation:

Employee Health Cards are available and updated during the audit. The company has documented medical screening procedures in SSOP & CGMP manual and all employees undergo medical screening before joining work and later at regular intervals i.e. once in every year or immediately after joining. Declaration is sought from all Visitors regarding their health; they are briefed to notify in case of any infectious diseases. Daily Personal Hygiene checklist verified. Medical records as Health Cards for all workers are documented. Medical cards Certified by Dr. P. La [REDACTED] Reg # [REDACTED]
 E.g. verified for Suc [REDACTED] - dated 15-09-2023. Antityphoid and paratyphoid vaccine has been give, dated 16.09.2023 Batch 19930c71c2.
 Cantten chef - Kun [REDACTED] - dated 10-06-2022. Also vaccination done on 16-04-2023.
 All canteen workers were medically checked on 14-0302023 in KIMS hospital including exrays.
 Companies personnel are briefed to notify in case of any infectious diseases, while those absent are asked to produce a medical certificate and/or undergo medical screening.
 Visitors and Contractors are also asked to sign a health declaration before entering the production areas.
 Visitors and Contractors are also asked to sign a health declaration CCCIII/REC/62 before entering the production areas.

Pillar	Reference	Conforming
Food Safety	3.12.3	Yes
Clause and Explanation		

Clause:

Medical screening procedures shall be in operation for employees, contractors and visitors.

Explanation:

The Control of Employee Health Condition procedure is documented in

Ref: SSOP/01 sec 07

Personnel hygiene is monitored using Pre-operative & workers Hygiene Checklist SSOP/PD/04

All personnel are screened for general health before entry to production

and storage areas

Visitors and contractors are requested to provide information related to their health status.

The company provides basic medical care within the facility. First aid kits are readily available at various locations in the factory. The facility is having trained personnel on first aid to take care of workers in case of any medical need. They take the workers to a nearby hospital (3 Km away from the facility). Agreement with hospital verified. Contract letter verified.

Vehicle provided round the clock to take workers to the hospital. Contact numbers are displayed to gain access to medical authorities. ESI for all workers seen. Diagnosis register for worker is available during the audit. The facility also provided separate room for doctor. Verified the Health cards of 12 members. Typhoid and Tetanus Toxoid found satisfactory. .

Pillar	Reference	Conforming
Food Safety	3.12.4	Yes
Clause and Explanation		

Clause:

All employees shall be monitored for signs of contagious illnesses (coughing, sneezing, sores, skin infections, etc.) and personnel related food borne illness (diarrhea, fever, jaundice, etc.) upon arrival and during work in food production and packing areas, those found to be ill shall be removed from the plant site (records shall be maintained).

Explanation:

Personnel Hygiene Log is maintained and updated as monitoring of employee health, signs of illnesses, skin infections. Temperature checks of personnel to control the Covid -19 issues in place.

Pillar	Reference	Conforming
Food Safety	3.12.5	Yes
Clause and Explanation		

Clause:

The facility shall have a policy in place that requires employees to report immediately to their supervisor if, during the work day, they become injured or ill.

Explanation:

This policy is mentioned on personal hygiene procedure on SSOP Manual and according to the policy the ill or injured worker immediately send for rest and medical checkup under supervision of section supervisor.

Pillar	Reference	Conforming
Food Safety	3.12.6	Yes
Clause and Explanation		

Clause:

All workers in food production and packing areas shall not wear jewelry (including earrings, facial piercings, watches, bracelets, false fingernails, false eyelashes, etc.), and shall not carry items in pockets. Medical bracelets, necklaces or wedding bands may be worn with proper protection to prevent food contamination with management approval. Such jewelry shall be smooth with no stones or recessed areas.

Explanation:

The workers in food production and packing areas follows “No Jewelry” inside production and packaging area as mentioned in Jewelry policy in Personnel Hygiene Policy . Employees are checked for wearing jewelry or carrying them at plant entry by Designated Supervisor. Monitoring is recorded in Employee Hygiene Checklist.

Pillar	Reference	Conforming
Food Safety	3.12.7	Yes
Clause and Explanation		

Clause:

Workers shall wear appropriate protective clothing (clean aprons, hair confinement, face masks, boots, etc.) for their assigned tasks.

Explanation:

Clothing includes Clean aprons, Cap, Face mask, Boots etc. Machine Room Staffs are provided with Safety shoes, Helmets, Goggles and Ear Plug. Separate colour coding of uniforms

Pillar	Reference	Conforming
Food Safety	3.12.8	Yes
Clause and Explanation		

Clause:

Employees shall keep food and drink out of processing, packing and storage areas, and shall not smoke or chew tobacco or gum. This clause also covers the use of e-cigarettes, hallucinogenic or recreational drugs.

Explanation:

Employees are prohibited from eating, drinking, smoking or chewing gum in the plant production area, packaging and storage area. Plant enforces strict monitoring by Designated Supervisors at each section. Related display boards as “No Smoking”, “No Food or Drink in process area” etc. are displayed

Pillar	Reference	Conforming
Food Safety	3.12.9	Yes
Clause and Explanation		

Clause:

Employees shall keep personal items including any personal medication out of processing, packing and storage areas.

Explanation:

Yes. Employees are physically checked at point of entry by Designated Hygiene Supervisor and monitoring is recorded in Employee Personal Hygiene Register and updated. Employees store personal items only in cupboards provided in the change room.

Pillar	Reference	Conforming
Food Safety	3.12.10	Yes
Clause and Explanation		

Clause:

The facility shall have a sufficient number of foot baths, foamers or sprayer systems, hand-washing/hand dip and sanitation stations located throughout food production areas. These shall be properly maintained and not easily avoided in order to promote good sanitary practices.

Explanation:

Yes. Foot bath and hand sanitation stations provided at every entrance to the Plant. Monitoring & enforcing employee use of hand washing and foot bath. Supervision of personnel was noted before entry to processing area.

Pillar	Reference	Conforming
Food Safety	3.12.11	Yes
Clause and Explanation		

Clause:

The facility shall monitor and enforce employee compliance with proper sanitary procedures, hygiene policies, and the use of sanitation stations described in 3.12.10 Workers shall use hand-washing stations routinely throughout the work period, or as needed to maintain the sanitation levels outlined in the facility SSOPs.

Explanation:

Sufficient hand washing with liquid soap, sanitizer and disposable towel is available and in operative good condition at process area entry and inside the plant also.. Employees use these hand wash stations as per requirement and routinely as per assigned task.

Pillar	Reference	Conforming
Food Safety	3.12.12	Yes
Clause and Explanation		

Clause:

The facility shall provide a sufficient quantity of sanitary supplies (or where culturally applicable, washing facilities), disposable hand towels or other drying mechanism, and soap in employee sanitary facilities. Mechanical air drying shall be tested periodically for microbiological contaminants.

Explanation:

Proper arrangement was seen in change room and near the toilet. The facility is providing sufficient quantity of toilet paper, soap, hand dryer in employee sanitary facilities. Air from Hand dryer is checked for microbiological contamination -

Pillar	Reference	Conforming
Food Safety	3.12.13	Yes
Clause and Explanation		

Clause:

The facility shall monitor sanitary facilities for proper operation and stocking as described in 3.12.12. Facilities shall further ensure employee compliance with proper use of sanitary facilities, including hand washing after toilet use.

Explanation:

Adequate monitoring record was found available for sanitary facility operational & stocking condition verification and proper hand washing after Toilet use and documented under Toilet Hand washing and Sanitising Confirmation Checklist - High Risk area dated 25-09-2023.

Pillar	Reference	Conforming
Food Safety	3.12.14	Yes
Clause and Explanation		

Clause:

There shall be a documented policy that instructs contractors and visitors on facility sanitation and hygiene policies, including hand washing, control of personal items, and the proper use of protective clothing. They shall be required by the facility to follow these policies.

Explanation:

Visitors and Contractors are appraised of sanitation procedures and control of personal items, use of protective clothing etc. Visitor Policy and Visitor Declaration verified

Pillar	Reference	Conforming
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Food Safety	3.13.1	Yes
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Clause and Explanation

Clause:

Water used in food production areas shall be checked at least every six months by an accredited independent third-party laboratory for microbial and chemical contamination as described in Annex 5. Discharge of retort cooling water shall be monitored internally and by third-party laboratory in accordance with applicable regulations and/or facility HACCP plan.

Explanation:

Source of water Borewell. and being treated with well-equipped and maintained water treatment plant before being used in the production. Sample is taken from various points as indicated in plan.

The water is tested against the requirements of 98/83EC as per regulatory guideline, 2 yearly and six-monthly. Water is tested at in-house laboratory on daily basis as per sampling plan for TPC, Coliform, and Vibrio cholerae.

Annex 5 – Water quality Testing Parameters

Test report for Water from processing as per IS10500:2012 dated 09.06.2023 – covering all heavy metal parameters as per Annex V

Test Report from SMS Lab NABL TC- 6118 for water and ice testing as per EC 98/83 – dated 21 March 2022- processing water Tap 12 . ULR No. TC611822000005521F.

Ice test report TC596023000031899F dated 12-05-2023 tested for APC, Coliform, E.coli meeting requirements.

Internally water and ice are tested for microbiological parameters Daily, and Reports verified on dated 05/11/2022. Found Satisfactory. Format CCCIII/OPRP/QC/01. Found Satisfactory.

Pillar	Reference	Conforming
Food Safety	3.13.2	Yes

Clause and Explanation

Clause:

Water used in food production areas shall be assured safe and in compliance with USDFA and/or EU standards for microbial and chemical contaminants and disinfection treatments. Routine water quality checks during production days shall be carried out by the facility for residual disinfectant levels (such as chlorine or ozone). These checks shall occur at a minimum daily. The facility shall also test as for the presence of coliforms at minimum every 2 weeks.

Explanation:

Complies with EU requirements as per EU Directive 98/83/EU and includes level of residual chlorine within approved limits that meets USFDA requirements. Chlorine level maintained bellow 2 ppm in process water. Monitoring record for Chlorination is maintained. Residual chlorine of process water is tested daily 1 hourly. Daily chlorination report CCCIII/DOC/QALAB-14 verified (Process water Level- 1.5 ppm). shows the checking of Foot dip, Hand wash, Process water and Ice.verifeid the record of Sep 2022. Coli forms analysis also verified on every days during sanitary sample analysis.

The facility tests coliforms in water on a daily basis using three tube MPN Method with detection limit of <3.0 MPN/100 ml. External testing of coliforms in water is done every 6 months with suitable method.

Pillar	Reference	Conforming
Food Safety	3.13.3	Yes

Clause and Explanation

Clause:

The facility shall prevent water contamination through backflow with proper water supply back flow/back pressure valves and proper hose storage.

Explanation:

Proper hose storage noticed in process area. Hose stand provided. Non Return valves are connected to hoses.

Pillar	Reference	Conforming
Food Safety	3.13.4	N/A
Clause and Explanation		

Clause:

All ice used on product or food production areas in the facility that is purchased from outside sources shall be tested at least every six months by a third-party laboratory accredited to ISO 17025 or equivalent for microbial and chemical contamination as described in Annex 5.

Explanation:

Not Applicable the clause requirement because the facility not purchasing any ice from out source.

Pillar	Reference	Conforming
Food Safety	3.13.5	Yes
Clause and Explanation		

Clause:

All ice produced by the facility itself using water that complies with clauses 3.12.1 and 3.12.2 shall be tested at least every six months by a third-party laboratory accredited to ISO 17025 or equivalent ONLY for the microbial parameters listed in Annex 5.

Explanation:

Ice test report TC596023000031899F dated 12-05-2023 tested for APC, Coliform, E.coli meeting requirements. Meets BAP's required frequency of external laboratory testing. All ice used is produced in the plant from the same water. Refer Water test report in 3.13.2. Same process water is used for making ice also. Test report ref. - 3.13.1 In house - water and Ice verified.

Pillar	Reference	Conforming
Food Safety	3.13.6	Yes
Clause and Explanation		

Clause:

Ice shall be stored in hygienic and well-maintained areas free of dripping condensation, rust, dirt and other contaminants. Ice shall not be re-used and shall be handled to avoid cross-contamination from utensils, employee garments, storage and transport bins, etc.

Explanation:

Ice is stored in hygienic and well-maintained areas free of dripping condensation, rust, dirt and other contaminants. Ice is not be re-used and handled so as to avoid cross-contamination from utensils, employee garments, storage and transport bins, and etc verified during the site visit on the day of audit.

Pillar	Reference	Conforming
Food Safety	3.13.7	Yes
Clause and Explanation		

Clause:

Routine ice quality checks, regardless of source, shall be carried be out by the facility for the presence of coliforms at a minimum, every 2 weeks.

Explanation:

Yes carried out the testing for presence of Coliform in ice once every week basis . verified and found satisfactory. However refer 3.13.2 regarding test method used for testing of coliforms

Pillar	Reference	Conforming
Food Safety	3.13.8	Yes
Clause and Explanation		

Clause:

Facilities shall have a procedure in place that ensures the safety of air, compressed air, steam, or other gasses used in direct contact with food or as an ingredient in food. The facility shall monitor these items to verify that they do not pose a risk of contamination to food or food contact surfaces.

Explanation:

Detailed procedure is verified that these items do not pose a risk of contamination to food or food contact surfaces. Steam is used for processing. Results found satisfactory. No compressed Air Or other gases used for food contact. Steam Testing Merieux NABL TC -5960 – dated 13-05-2023 – metals Lead, Arsenic, Cadmium, Mercury . Microbiology – APC, coliform count

Pillar	Reference	Conforming
Food Safety	3.14.1	Yes
Clause and Explanation		

Clause:

All chemicals, including cleaners, sanitizers, chlorine, boiler chemicals, etc. shall be approved for use in food plants and used per manufacturer's instructions at recommended safe dosage levels.

Explanation:

All chemicals, including cleaners, sanitizers are approved.Sulphite is not used in production area, for Head on Packing sulphite treatment is done at Farm site and related record is maintained. Chlorine is used at recommended safe dosage as per cleaning procedure documented. Daily chlorine use register is maintained. Use of treatment is recorded in

treatment record. Other chemicals such as cleaners (Liquid soap) also maintain in register as used. Format # CCCIII/REC/82 (Chlorine Issue Record).

Pillar	Reference	Conforming
Food Safety	3.14.2	Yes
Clause and Explanation		

Clause:

Monitoring records for all chemicals shall be maintained and readily available. These shall include at minimum the name of the chemical, concentration level, and tests performed to verify the correct concentration.

Explanation:

as defined in 3.11.1

Pillar	Reference	Conforming
Food Safety	3.15.1	Yes
Clause and Explanation		

Clause:

There shall be no evidence of condensation which has the potential to contaminate product, packaging materials, ingredients or food contact surfaces. Post process retort cooling areas shall be adequately vented to allow for proper cooling and drying.

Explanation:

Yes, Proper ventillation observed. There is no evidence of condensation at the facility in all the section of production hall and no chance of contamination of product, packaging materials, ingredients or food contact surfaces through condensation

Pillar	Reference	Conforming
Food Safety	3.16.1	Yes
Clause and Explanation		

Clause:

Procedures shall be in place to ensure raw materials, packaging, cleaners, sanitizers and ingredients are used in the correct inventory rotation order (first in-first out and/or first expiry-first out) and within the allocated shelf life (where applicable).

Explanation:

Records of incoming raw material – Shrimp and taken up for production is available. Records of incoming raw material– Packing Material Issue Reg (CCCIII/REC/29), Chemical issue Reg -CCC/REC/63.and taken up for production is available. Rawmaterial receiving & Evaluation Sheet (SOP/QC/17), Value Addition Record Record (FMT/QC/04) with due lot number assigned to be taken up for production. Ingredients (Phosphate, salt & Non-phosphate Blends) with appropriate

Batch Number and Best Before Date issued (Product soaking Monitoring Record - FMT/QC/07) for production within allocated Shelf Life and updated in Issue & consumption record. Packaging material inward and issued for Production.

Pillar	Reference	Conforming
Food Safety	3.16.2	Yes
Clause and Explanation		

Clause:

Product, ingredients, packaging, and other food contact items such as utensils, baskets, etc. shall be stored off floors, away from walls and covered.

Explanation:

All products, Ingredients & Packaging are properly stored above floors on pallets and away from the walls. Crates are stored on Pallets. Packaging found stored in Dry area with Proper covering.

Pillar	Reference	Conforming
Food Safety	3.16.3	Yes
Clause and Explanation		

Clause:

Records for the effective monitoring of frozen storage areas and coolers where products are held shall be documented. Cold storage areas shall be maintained at -18°C or colder with no more than the occasional 3°C fluctuation above -18°C (except during defrost cycles).

Explanation:

Two cold stores

Cold store temperature verified. -20.2 Deg C and -21..0 during site visit. Data Loger recording was verified in Sep 2023. No deviation observed and continuous monitoring of cold store temperature is available. Frozen store is connected with continues data logger., temperature was recorded during the visit. Product is transported in refrigerated vehicle; temperature monitoring record as per the buyers requirement.

Pillar	Reference	Conforming
Food Safety	3.16.4	Yes
Clause and Explanation		

Clause:

Raw material and finished product in frozen storage shall be off the floor on pallets. There shall be aisles maintained between pallets and space between pallets and freezer walls to ensure adequate air flow.

Explanation:

Raw material and finished product in frozen storage are off the floor on pallets. Adequate space maintained between pallets and freezer walls in frozen storage of raw materials and finished products. Compliance was noted during site visit.

Pillar	Reference	Conforming
Food Safety	3.16.5	Yes
Clause and Explanation		

Clause:

All vehicles, including contracted out vehicles, used for the transportation of raw materials, ingredients, packaging, intermediate/semi processed product and finished product shall be suitable for the purpose, maintained in good repair, at the proper temperature (where applicable) and be cleaned to ensure contamination of the transported goods does not occur. Where temperature control has been applied, it shall be continuously monitored.

Explanation:

Procedure for Vehicle Washing and Maintenance available in manual Manual. Vehicle checking verified in the Raw material Evaluation report SOP/QC/17 and in the Incomin ginspection reports of ingredients and Packing Materials. Cleaning and hygienic condition of transport vehicle is recorded. Cleaningand hygienic condition of transport vehicle is recorded

Pillar	Reference	Conforming
Food Safety	3.16.6	Yes
Clause and Explanation		

Clause:

There shall be a written inspection plan for all inbound and outbound goods that include, at minimum, the items listed in 3.15.5. Such checks shall ensure the items and delivery containers meet specifications for safety and quality.

Explanation:

Procedure for inspection of all inbound goods is available in CCCIII/SOP/09 for Raw Materials, Chemicals & Ingredients and Packing Materials as per the sampling plan. Inbound materials are used to check thoroughly by the supervisor and QC personnel according to the procedures which duly signed by QA Manager. Inspection monitoring records are maintained on doc.

Raw material evaluation and acceptance SOP/DOC/02a - Raw material – Quantity 8060 JM Aqua farms – BAP F11828 – Farm/ID- AP044378-1/012 received on 07 Aug 2023. Truck number AP26TD3399. Supplier Declaration FMT/QC/01 along with Shrimp Harvest Report . Raw material sampling and evaluation report – SOP/QC/17

Packing Material Quality Inspection - SOP/PD/01

Outbound products are inspected prior to the Shipment.

Shipment Report – FMT/QC/10 – loaded on 18.08.2023. has details of container loading, including cleaning of container, loading start 4.00 pm, 6.00 pm. Photos of containers are kept before and after cleaning. Set point of containers is always -20.0 Degrees C. The facility does not use own data loggers, but requests data from shipping line in case of any requirement. (e.g. also verified for container no. MNBU3011147- Maersk line)

Container Inspection Records – FMT/QC/10

Product Release Checklist FMT/QC/11 capturing Invoice Number, Brand, Packing, presence of Supplier Declarations, organoleptic checks, microbiological test reports, chemical test reports, labelling, CCP monitoring records, Vehicle Inspection Report, Traceability records, external inspection and testing formalities. etc. Dated 18.08.2023

Pillar	Reference	Conforming
Food Safety	3.17.1	Yes

Clause and Explanation**Clause:**

The facility premises, equipment, procedures and flow shall be designed, constructed and maintained to prevent the risk of contamination or allergen cross contact to food and food contact surfaces and ingredients.

Explanation:

Procedure is in SSOP. Lay out Map is available PL/01/. Unidirectional flow was evident. Plant location, design and lay-out and construction is done for proper material receipt and process flow, shipment of finished products, disposal of waste, sanitation controls etc. to avoid any cross contamination. Procedure is documented on Prevention of Cross Contamination. Regular monitoring is done by the online QC personnel for checking and verified

Pillar	Reference	Conforming
Food Safety	3.17.2	Yes

Clause and Explanation**Clause:**

Raw product areas shall be physically separated from ready-to-eat product by a non-permeable barrier with self-closing doors to ensure contaminants are not transferred into sensitive areas.

Explanation:

Plant produces both raw & Cooked products. There is a physical separation within the plant for pre-processing, processing activity, packing section. Material flow is only through chute with self closing door

Pillar	Reference	Conforming
Food Safety	3.17.3	Yes

Clause and Explanation**Clause:**

All items used in ready-to-eat (RTE) areas (e.g. bins, crates, utensils, ingredients, ice, etc.) shall be kept separate from those used in raw areas. Such items shall be readily identifiable as for RTE areas through color coding, labelling, or other effective means. There shall be an effective validation procedure and sanitation procedure in place for items used in raw areas prior to use in RTE areas. Such procedures shall be monitored daily.

Explanation:

Facility Produces Cooked RTE Products. Colour coding is Practised in Raw Section and RTE Section. Verified different Colour Uniforms, utensils etc in the RTE Section during site Visit. All Equipments and Utensils are Dedicated to RTE Sections.

Pillar	Reference	Conforming
Food Safety	3.17.4	Yes

Clause and Explanation

Clause:

All employees working in RTE areas, or moving from raw to RTE, shall be required to change into RTE-wear free of contamination in a designated changing room.

Explanation:

Different coloured dresses are used in the RTE Section. Including different coloured Gum boots. Visitors also have separate uniforms to RTE Section. Separate change Rooms are available.

Pillar	Reference	Conforming
Food Safety	3.17.5	Yes
Clause and Explanation		

Clause:

Process water shall adequately drain away from high-risk areas (cooking and ready-to-eat) to lower-risk areas where raw product is maintained.

Explanation:

Plant drain flows from high risk to low risk area. Complies with requirement as per the Plant layout.

Pillar	Reference	Conforming
Food Safety	3.17.6	Yes
Clause and Explanation		

Clause:

There shall be positive air flow and circulation from high risk areas to low risk areas. (To prevent cross-contamination in areas where raw product is in the proximity of ready-to-eat and cooked product).

Explanation:

Positive Airflow and Circulation from High Risk to low risk verified.

Pillar	Reference	Conforming
Food Safety	3.17.7	Yes
Clause and Explanation		

Clause:

Cleaning and sanitizing activities shall not occur where exposed product, packaging, ingredients or utensils are nearby to prevent cross-contamination.

Explanation:

Cleaning procedures are in place with Frequencies. Cleaning and Sanitation done at Breaks only. Proper protection is ensured by Qc during the Cleaning Process. Products are stored in covered bins and crates. Closed crates are kept on pallets, off floor, during floor washing and sanitation as seen during plant visit.

Pillar	Reference	Conforming
Food Safety	3.17.8	Yes
Clause and Explanation		

Clause:

All products in chilled and/or frozen storage shall be kept in protective sealed cartons. Ready-to-eat and raw products shall be kept separated from one another within the storage area. The facility shall maintain ambient refrigerated and/or freezer temperatures that inhibit bacterial growth, pathogen growth, and/or toxin development.

Explanation:

Raw product is stored in separate pallet. Proper process control was seen. Cooked Products are kept in isolated area. Raw material found stored in Chill room at 2.9 Deg C. Frozen final storage temperature verified as -20.5 Deg C.

Pillar	Reference	Conforming
Food Safety	3.17.9	Yes
Clause and Explanation		

Clause:

There shall be effective procedures in place to prevent cross-contamination and cross contact between allergen and non-allergen products, ingredients, utensils, and workers throughout receipt, storage, handling and use. Such procedures shall also be in place to prevent cross-contamination between ingredients or products with different allergens. These measures shall include physical separation, color-coding, labeling, time separation, or other effective means.

Explanation:

Details

Risk assessment for allergens – is done as part of HACCP.

All Species processed are identified by Scientific Name

Allergen risk from raw material, additives, lubricants, and process has been considered during hazard analysis and control measures are established. List of allergens handled by the facility is available and they are Crustacean (shrimp).

Allergen (sulphite) risk through raw material has been considered during hazard analysis and control measure is established. Sulphite treated shrimp is rejected at receiving point (limit below 10 ppm) every received lot is screened for the presence sulphite. No other special handling is required. The Allergen Risk is declared in the Final Label and the same is controlled as CCP.

Allergen control training - Allergen control dated 07.10.2023 for 105 personnel

Also refer 3.2.6

Pillar	Reference	Conforming
Food Safety	3.18.1	Yes
Clause and Explanation		

Clause:

There shall be a written program for the use of food additives or chemicals. Such as sulfites, color additives, phosphates, phosphate blends or other moisture retention agents. The facility shall also verify that these items are food grade and used in compliance with legal, customer, and manufacturer's requirements. Facilities shall document that the combination used do not create hazards.

Explanation:

Food additives and chemicals using programme is documented in GMP Manual and monitoring is done which recorded on FMT/QC/07 . The facility is not using sulphite, chemicals include chlorine using which is regularly monitoring and controlled way. Phosphate is using as per as buyer requirements which is food graded. COA of concern chemicals are checked and verified under compliance with legal, customer and manufacturer requirements. All the programme is verified by the GM. Food Grade Chemicals is used. Hazard analysis for the same is conducted during Hazard analysis of ingredients and control measure is established. Product Treatment with Phosphate, salt or non-phosphate based chemical. Supportive Monitoring document Soaking Register .

Test Report from Merieux – dated – 02-06-2023 for STPP (R&B Food Supply) for 230323015 – Purity, heavy metals, etc. Supplier is Harish Chemicals – Agreement date 03 Oct 2023 – Specification have been communicated and agreed. Salt- ITC Analytical Services – Salt – Nirma – Batch 723 – Lead Cadmium, mercury, arsenic, Copper, Insoluble matter. Also for Insoluble matter, purity, Iodine. S.aureus, Sulphite reducing clostridia

Pillar	Reference	Conforming
Food Safety	3.18.2	Yes
Clause and Explanation		

Clause:

The facility shall conduct microbiological testing on finished product lots for bacterial pathogens for the parameters and frequency as required by local and country of export legislations and customer specifications. Note: Both primary (first) processors and secondary (value added processors receiving from a primary plant) are required to comply with this testing requirement.

Explanation:

Facility conduct microbiological testing on finished product lots based on regulatory body EIA guideline. Details Procedure, sample quantity and random sampling from received lot and finished product lot, composite samples based on code, type and variety etc., are collected and analysed and complies with BAP requirement (as per Annexure - 4, table - II) and as per Export Inspection Agency, Government of India regulatory requirements. Sample analysis records are inspected once in 2 months by EIA Officer and signed in the register. Raw materials (H/on) test reports Once in two months -Refer Clause 3.2.12. Microbiological testing of Finished product lots done in-house laboratory on daily basis CCCIII/DOC/QALAB/22/07A/07C. sometimes testing used to be done by the third party lab based on the buyer requirements. Finished product test report was seen. Sampling Every Consignment as per Customer Requirements. And Finished product tested every Consignment against Customer specification.

Inhouse Microbiology Register (CCC III/DOC/QALAB/22/07A/07C)- TPC, E.coli, coliform, Staph, Salmonella, VP, VC, Listeria (only for cooked product samples) -

During raw material shrimp receiving organoleptic inspection is conducted for every 500 kg, sulphite testing is conducted for every received lot, microbiological parameters (TPC, E. coli, V. cholera, V. parahaemolyticus, Staphylococcus aureus, Salmonella) is tested at in-house laboratory for every lot (vehicle wise) Format # CCCIII/DOC/QALAB/22/07A/07C.

Microbiology parameters evident in Test report no. ULR No. TC545923000003564F as per BAP Annex including Listeria

Pillar	Reference	Conforming
Food Safety	4.1.1	Yes
Clause and Explanation		

Clause:

The facility shall document and implement appropriate Product Release Procedures that identify processes and testing procedures that shall be performed. These Procedures shall identify the responsible person or persons authorized to release product and include food safety, quality and legal specifications that shall be verified as having been met prior to release.

Explanation:

Documented Product Release procedures

Ref:CCCIII/SOP/10

Release criteria are COC, packing list, Health certificate, export order, shipment monitoring, gate pass, QA product release (satisfactory completion of organoleptic, microbiological test, hygiene and sanitation monitoring report, raw materials inspection report, traceability, labelling check, temperature, weight, volume and QC check aligned with customer and regulatory requirement before dispatch. Currently release of shipment is done by QC Manager.

Product Release Checklist FMT/QC/11 capturing Invoice Number, Brand, Packing, presence of Supplier Declarations, organoleptic checks, microbiological test reports, chemical test reports, labelling, CCP monitoring records, Vehicle Inspection Report, Traceability records, external inspection and testing formalities. etc. . Verified for Product :

Four star - Frozen Cooked in Shell Deveined Tail on shrimps IQF - Batch code 3F24

(24- June 2023) - 400 cartons 16x12Oz in a Master Carton. (2173kg). Invoice no. TCAM/044/23/24 dated 24-07-2023 - Choice Canning Inc. Destination New Jersey USA. Container No. MNBU3699451 BL 229352338 onboard date 26-07-2023. Vishakapatnam.

Farm ID AP010891-1/045 - Chakravarthi and Partners - (BAP ID F11823)- Certificate and agreement:, Hatchery - H10327 GeeKay Hatchery, M10040 AVANTI FEEDS LIMITED (1&3)- Details from Shrimp Harvest Report - SOP/QC/35 and Supplier decalration FMT/QC/01 Farm Audit CCCIII/REC/87 dated 03-06-2023.

Pillar	Reference	Conforming
Food Safety	4.2.1	Yes
Clause and Explanation		

Clause:

The facility shall have an internal audit system in place that requires self-assessment of the facility's performance against the full scope of the SPS Standard, including its Annexes.

Explanation:

Internal Quality audit procedure

Ref:CCCIII/SOP/06

Internal Audit Plan:CCCIII/REC/045

Internal Aduit Schedule CCCIII/IA/02

Internal audit frequency is based on the risk analysis and self-assessment of the facility's performance against the full scope of the SPS 5.1 standard, including its Annexes. Internal Audit also conducted monthly basis on different sections. Records are verified.

Pillar	Reference	Conforming
Food Safety	4.2.2	Yes
Clause and Explanation		

Clause:

The facility's internal auditors shall be trained and competent to conduct internal audits. and the facility shall have a provision against internal auditors auditing their own departments or functions.

Explanation:

List of Internal Auditors with their comptency are verified. 10 Internal Auditors. List in CCCIII/REC/67.

05 personnel have recently attended - Awareness training on BRCGS Global Standard for Food Safety Issue 9. by

Intertek dated 18-19 Aug 2023.

Internal audit training record was seen for the internal auditors

Inter departmental audits were observed. No auditor is audited his own department.

Pillar	Reference	Conforming
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Food Safety	4.2.3	Yes
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Clause and Explanation

Clause:

Records of the Internal Audits shall be maintained. Records shall reflect results of the internal audit, including conformity and non-conformity. Where non-conformities are found, records shall document corrective actions and time frame for completion for each.

Explanation:

Internal Audit Covers Food safety & QMS, MRM, Customer Satisfaction, Legal compliances, BAP Requirements etc. covering entire scope of BAP including the Anexes.

Internal Audit records are documented

Environmental compliance dated 18- Jan-2023 - Auditor Mr. Ba [REDACTED] - Senior Technologist - Auditee P. K [REDACTED] Sr. Executive HR. no Findings

Health and Safety Audit dated - 28 Feb 2023 - Auditor - Mr. Shi [REDACTED] - Senior Technologist - Auditee is Mr. Sre [REDACTED]

GMP Audit dated 29.08.2023. No.Findings

Monthly Fabrication and Hygiene Audits - Doc CCCIII/REC/33 - 2 findings raised.

Timeframe for completion is verified

Pillar	Reference	Conforming
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Food Safety	4.2.4	Yes
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Clause and Explanation

Clause:

The internal audit frequency within the facility and its departments shall be determined by risk assessment and shall be carried out annually at a minimum.

Explanation:

Internal audit covers all departments atleast once in a year. Internal audit frequency fixed based on the Risk Assessment-

Ref: 26-11-2022

Pillar	Reference	Conforming
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Food Safety	4.3.1	Yes
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Clause and Explanation

Clause:

Process-monitoring instruments critical to food safety and legality shall be calibrated, or tested for accuracy, internally (i.e. by the facility in house). Such instruments would include thermometers, pH meters, salinity meters, metal detectors, or other items that monitor CCPs.

Explanation:

Calibration Procedure in SOP Manual- CCCIII/SOP/45. A master list is prepared by covering all critical measuring and monitoring devices FMT/CC/01. These are identified adequately and calibrated at regular interval as per the schedule with national standard which is traceable. Daily calibration is carried out internally with standard weight, verified for month May 2021. Thermometer Calibration internally verified daily. Daily accuracy checks of Thermometer (FMT/SOP/087), weighing scale (CCCIII/DOC/QALAB-28) and pH meter (CCCII/DOC/QALAB-27) are verified. Found OK

Pillar	Reference	Conforming
Food Safety	4.3.2	Yes
Clause and Explanation		

Clause:

The facility shall maintain a documented calibration/accuracy check schedule that identifies all measuring and monitoring devices referred to in 4.3.1 and 4.3.5. The schedule shall identify each item, calibration date, scheduled frequency, recognized method or standard calibrated to, the source of the method or standard, and the party that performed the calibration.

Explanation:

2023 Calibration Schedule & list verified for all Measuring Equipments verified in file. Identified daily calibration internally and annual calibration by Outside agency.

Pillar	Reference	Conforming
Food Safety	4.3.3	Yes
Clause and Explanation		

Clause:

The process monitoring instruments critical to food safety and legality referred to in 4.3.1 shall be calibrated or tested/checked for accuracy in-house at an adequate frequency and shall include an annual validation study of the functioning of the instruments under normal plant operating conditions.

Explanation:

Daily accuracy Checks of pH calibration, Metal Detectors and Weighing Scales and Thermometres verified. Annually these equipments calibrated in an Outside agency for the equipment validation. Reports verified. Refer 4.3.5 also.

Pillar	Reference	Conforming
Food Safety	4.3.4	N/A
Clause and Explanation		

Clause:

Low Acid Canned Foods (LACFs) process controls (including heat distribution, heat penetration, post process validation, scheduled processes) shall be conducted on a pre-determined frequency by a recognized Processing Authority or other regulatory approved alternative method.

Explanation:

Not applicable. No LACF.

Pillar	Reference	Conforming
Food Safety	4.3.5	Yes
Clause and Explanation		

Clause:

The facility shall ensure that all measuring and monitoring devices critical to food safety referred to in clause 4.3.1 are externally calibrated at least annually by a qualified third-party and are traceable to a recognized standard.

Explanation:

Master list is covering all critical measuring and monitoring devices.

These are identified adequately and calibrated at regular interval as per the schedule with national standard which is traceable. Calibration schedule is documented for the year 2023 both internal as well as external. List of Weighing Scales verified. Calibration Schedule of 2023 also verified.

External calibration done by Competent Provider

Calibration done by PSR Labs, Hyderabad - CC-3095

CC309522000004710F - Moisture analyser-dated 12-07-2023 due 11-07-2023

CC309522000003286F - Digital Temp Indicator with sensor for Cooker zone-2 -dated 10-05-2023 due 09-05-2023

CC309522000003265F - Electronic balance Sl. no. F20400117 in production -dated 10-05-2023 due 09-05-2023

CC309522000003234F - BOD Incubator -dated 10-05-2023 due 09-05-2023

PSR/23-05/3244/005 - pH meter -dated 10-05-2023 due 09-05-2023

PSR/23-05/3244/007 - Metal detector -dated 10-05-2023 due 09-05-2023

Data logger-

Master Thermometer

Legal Metrology certificate of verification No. B94 082361 dated 20/03/2023 for 6 weigh scales. due date 19.03.2024

Daily calibration is carried out internally with standard weight, verified for

Pillar	Reference	Conforming
Food Safety	4.4.1	Yes
Clause and Explanation		

Clause:

The facility shall prepare a written sampling plan that details frequency and type of product testing. This sampling plan shall comply with the GSA testing requirements for antibiotics, microbial contaminants, and chemical additives described throughout the Standard and its Annexes. This sampling plan shall also incorporate any testing beyond GSA that are required by the local or country of export buyers or regulatory authorities.

Explanation:

Sampling size, testing frequency, procedures, maximum or minimum tolerance levels, corrective action, responsible personnel, and recordkeeping requirements associated with all of the quality management procedures are defined in Lab sampling Procedure CCC/SOP/LAB/SOP, also in GMP Manual CCCIII/GMP/001

Also in SOP Manual - Shrimp Raw Material Evaluation and Acceptance SOP/DOC/02a including Annexure I

A comprehensive sampling and testing plan covering BAP requirement also is available authorized by FSTL Sreejith. including raw material, finished product, Water and ice, Chilled water and glaze water, steam, Effluent, drinking water, addittives, etc.

Pillar	Reference	Conforming
Food Safety	4.5.1	Yes
Clause and Explanation		

Clause:

The facility shall prepare and implement a system to ensure that all product and ingredient testing and analysis critical to food safety are conducted to ISO 17025 or equivalent (i.e. the "General Requirements for the Competence of Testing and Calibration Laboratories"). This applies to both internal labs and external third-party labs.

Explanation:

All Product and Ingredient analysis carried out in the plant is as per Regulatory Body Details
In-house laboratory is approved by regulator

and confirming to ISO – 17025 equivalent standards. ,
External labs/ Subcontractors are all certified to ISO 17025.
Details
Merieux NABL TC -5960
SMS Lab NABL TC- 611
from Intertek NABL TC6434
ITC Analytical Services NABL TC-5459

Pillar	Reference	Conforming
Food Safety	4.5.2	Yes
Clause and Explanation		

Clause:

Records of third-party laboratory testing, testing methods, and the accreditations or approvals they have, shall be maintained. (Refer to Annex 4).

Explanation:

Yes available for each finished product lot, consignment wise, as per BAP requirements for finished products (once in 6 months) and raw materials as per risk assessment. Testing is also doe as per customer requirements.
Verified the same as part of traceability exercises

Pillar	Reference	Conforming
Social Accountability	5.1.1	No - Minor
Clause and Explanation		

Clause:

Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker. The facility shall have in place policies and procedures pertaining to, but not limited to: worker health and safety and compliance with requirements regarding wages, benefits, hours, hiring practices, minimum age, status of workers, and good employee relations that provide the highest protection to the workers.

Explanation:

Facility adopted different Standing Orders as per Section 7 of the Industrial Employment Act, 1946 and Rule 5 of Industrial Employment Act Rules, 1953. These standing orders covering all the local, national and international laws, rules and regulations. Certified copy of Standing Orders Social Accountability is available in English prepared against the requirement of Industrial Employment Standing Orders Act 1946 vide ref. File No. - D/R.Dis.1121/2022 dt. 26 Oct 2022 authorized by Joint Labour Commissioner, Zone II, Eluru, AP.

Facility has made the Social Accountability Policy included all the applicable policies for workers health, safety & legality.

Equal Remuneration Policy - CCC/POL/ERP/01

First Aid Policy - DOC/NO/CCC/POL/FAP/001

Anti Sexual Harassment Policy- CCC/POL/POSH/001

Social Accountability Policy - CCC/Pol/HR/SAP/001

Wages and Salary - DOC/MO/CCC/POL/WSP/001

Working hours Policy CCC/POL/HR/WHP/001- also regarding overtime

Freedom of Association and Collective Bargaining- CCC/POL/FA/001

Workers Health & Safety Policy- DOC/NO/CCC/POL/HS/001

Leave and Maternity Policy - DOC/NO/CCC/POL/LP/001. Also Procedure for pregnant women in place.

Anti Corruption Policy - DOC/NO/CCC/POL/ACP/001

Non Discrimination Policy - DOC/NO/CCC/POL/CL/010

Policy on Prohibition of employment of child/forced/prison labour - DOC/NO/CCC/POL/CL/001

Grievance Redressal Policy and Procedure - DOC/NO/CCC/POL/CL/009

Overtime Policy - PPL/QMS/HRD/D04. The policies are made only in English

Display of labor act on the notice board both in English & local language was seen.

Minor NC

Facility has put in place - social Accountability Policy policies for workers health, safety & legality. However, the policies are made only in English and none of the local Languages. Though, the certified Standing order in English and local language Telugu is available to workers.

Pillar	Reference	Conforming
Social Accountability	5.1.2	Yes
Clause and Explanation		

Clause:

Facilities shall comply with all applicable anti-bribery laws and not participate in any act of corruption, extortion, embezzlement, or any form of bribery – either directly or indirectly.

Explanation:

Anti Bribery Policy is in Place. Anti Corruption Policy - DOC/NO/CCC/POL/ACP/001. During the interview with workers and discussion with management it was evidence that there is no corruption, Extortion or bribery.

Pillar	Reference	Conforming
Social Accountability	5.2.1	Yes
Clause and Explanation		

Clause:

The facility shall ensure that workers are paid at least the legal minimum wage, or the wage rate established by an employment contract or collective bargaining agreement, whichever is higher. Regular wages and compensation shall cover the workers' basic expenses and allow for some discretionary funds for use by workers and their families.

Explanation:

Andhra Pradesh

Minimum wage notification - GO No. MS No. 93 LET & F Lab II Dept dt 28-09-2007 - Gazette no. 617 dated 26-10-2007 - Notification by Commissioner of Labour Vijayawada - No. G /466/2023 dated 29.03.2023 - related to Cost of living index- as on 01.04.2023 - VDA for 1153 points - Rs. 7090.95
minimum wages for process worker is Rs. 11452.95

Verified Payslips -

Arundhati (Process worker) - Gross - Rs. 11500 (Basic +DA Deductions) - PF 12% (Rs 1380) ESI 0.75% (Rs 87)
Total deductions Rs 1467 and Balance wages Rs. 10033 (Aug 2023) paid through contractor directly bank account
(Verified Statement of Account - HDFC - from Sona Enterprises to Account of Arundhati - on 5th Sept 2023). Actual working days 25+ 5 Weekly offs- 01 Public holiday 15-Aug-2023 - not worked. Verified attendance - Manually maintained.

So Wages Register Form IX is maintained contractor wise. Verified for workers under approved contractor Sona Enterprises for the month of Aug 2023 - all workers covered under PF and ESI. All personnel paid above minimum wages. All salaries paid through Bank. No cash payments.

Salaries are typically paid on 5th of every month.

Earned leave - Leave with wages register - Form 15 - is maintained.

Verified full and final settlement- for gauri - Emp Id SEPW030 - Sona Enterprises- Date of Exit - 31-10-2022- including bonus - earned leave encashed (2 days) through Bank.

Pillar	Reference	Confirming
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Social Accountability	5.2.2	Yes
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Clause and Explanation**Clause:**

The facility shall provide benefits that, at minimum, are required by local or national law (such as paid holidays, maternity leave, health insurance, paid sick time, etc., as applicable).

Explanation:

There is a policy on working hours and payment of wages which also covers the holidays and its payments. At present the facility provides a weekly off for all the employees, for office staff it is on rotational basis and for shop floor workers and security its on a rotational basis. 26 weeks of maternity leave for all the employees.

List of Holidays for year 2023 is communicated to employees- Govt of AP. Proceeding of Joint Commissioner of Labour Zone-II Eluru. -04 National Holidays and 04 Festival and other holidays

Pillar	Reference	Confirming
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Social Accountability	5.2.3	Yes
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Clause and Explanation**Clause:**

The facility shall compensate workers for overtime hours worked beyond the nationally mandated regular work week, at a premium rate, as required by local law.

Explanation:

Overtime Policy in HR Manual. Over time work is voluntary. During interview it was confirmed that no employees have worked overtime ever since the starting of their employment. Verified the time records, production records and overtime

records of 10 employees and found that there is no overtime work performed. Company follow over time norms as 12 hr Max/ week and 48 Hr Max/ month. But no over time works done.

Pillar	Reference	Conforming
Social Accountability	5.2.3.A	N/A
Clause and Explanation		

Clause:

Please input the average overtime pay rate per hour in USD (United States Dollar).

Explanation:

0

Pillar	Reference	Conforming
Social Accountability	5.2.3.B	N/A
Clause and Explanation		

Clause:

Please input the average number of overtime hours for a worker in a month.

Explanation:

0

Pillar	Reference	Conforming
Social Accountability	5.2.4	Yes
Clause and Explanation		

Clause:

The facility shall not make deductions from wages that are unauthorized or not provided for by national law. Facilities shall not make deductions from wages as part of a disciplinary process. Neither shall the facility make deductions from wages including but not limited to provision of work tools, transportation, and/or others that are not specified in the written contract between facility and workers.

Explanation:

No unauthorised deduction has been noticed in the Salary Payment Register of the sampled employees, deduction is only made for EPF and ESI.

No deduction is was evident as a part of disciplinary process.

Pillar	Reference	Conforming
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Social Accountability	5.2.5	Yes
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Clause and Explanation

Clause:

The facility shall not have inappropriate access to the worker's bank account. Payment of wages shall not be made to someone other than the worker or into an account not controlled by the worker.

Explanation:

As per site and interviewed personnel, salary payments are directly made to their respective bank accounts. Verified mode of payment for sampled employees/persons

Pillar	Reference	Conforming
Social Accountability	5.2.6	Yes

Clause and Explanation

Clause:

The facility shall issue wages directly to workers and not withhold or delay or make irregular payments. All wage payments shall be documented. A record of wage payment (such as a pay slip) shall be provided to the worker and include itemized detail of all benefits provided and the deductions that were made.

Explanation:

Payments are made on regular basis before 5th day of every Month. Verified the salary statements. E.g- Aug 2023 Salary paid on Jan 2023 payment on Pay slip provided to all the workers with salary break up and deductions made.

Pillar	Reference	Conforming
Social Accountability	5.2.7	Yes

Clause and Explanation

Clause:

The facility shall maintain all relevant documents that verify any contracted/subcontracted workers, whether through a labor employment service, recruiter, or otherwise, are paid in compliance with all local wage and overtime laws.

Explanation:

Detailed individual employment contract issued in Telugu, Hindi and English Language as applicable. The facility is employing workers directly.

Pillar	Reference	Conforming
Social Accountability	5.2.8	Yes

Clause and Explanation**Clause:**

The facility shall not use contractors, subcontractors, temporary workers, homeworkers, apprentices or other non-full-time employment schemes to avoid the payment of benefits, social security, etc. required by local or national law under a regular employment relationship.

Explanation:

The site uses contract workers and provides all amenities as for own workers.
Contract workers are used - as this site is under lease for a short period of three years.

Pillar	Reference	Conforming
Social Accountability	5.2.9	N/A

Clause and Explanation**Clause:**

The facility shall maintain all relevant documents that verify piece workers (those paid a fixed "piece rate" for each unit produced or action performed regardless of time) are paid in compliance with local or national law, including regulations regarding equivalence to or exceeding minimum requirements regarding wages, overtime and holiday pay.

Explanation:

Not applicable, there is no piece rate working in this facility.

Pillar	Reference	Conforming
Social Accountability	5.3.1	Yes

Clause and Explanation**Clause:**

The facility shall set working hours that comply with local or national laws, contractual agreements where applicable, or industry standards in the country, whichever affords greater welfare to the workers. However, in no case shall the regular work week (excluding overtime) exceed 48 hours.

Explanation:

The facility works in 3 shifts Plant follows 8 hours (Three shift) per day x 6 days in a week. 6.00am to 2.00 pm and 2.00pm to 10.00 pm. Genral shift 9:00 am to 6:00 pm. 15 minutes teatime in first half and 15 mnts tea time in second half and 60 min lunch break in the middle (1 hrs 30 mnts Break) Meets the mandatory work period as per Government Order and approved by the Factory Inspector. Random verified last six months attendance of workers from securiity register (IN & OUT) and found satisfactory. Company provided weekly off. Weekly off has been provided for all the employees on a rotational basis.

Pillar	Reference	Conforming
Social Accountability	5.3.1.A	N/A

Clause and Explanation**Clause:**

Please input the average number of hours for a worker in a regular work week.

Explanation:

48

Pillar	Reference	Conforming
Social Accountability	5.3.2	Yes

Clause and Explanation**Clause:**

Overtime shall not exceed 12 hours per week except as permitted by national law and agreed to between the facility and workers in a voluntary contractual agreement. The facility shall demonstrate any overtime that exceeded 12 hours per week only occurs under exceptional circumstances with due measures taken to ensure workers' health and safety during overtime work.

Explanation:

Facility has an overtime policy which states that 2 hours a day, 12 hours a week and 50 hours in a quarter of a year is the allowable over time. On verification of workers attendance records for 10 randomly selected workers for the months of July to Sept 2023 it was evidenced that there is no overtime work performed.

Pillar	Reference	Conforming
Social Accountability	5.3.3	Yes

Clause and Explanation**Clause:**

The facility shall not terminate an employee's contract for refusal to work overtime or deploy any other detriment for noncompliance.

Explanation:

There is no evidence that facility has terminated any employee for not doing the overtime. The same has been confirmed during review of personal files and interview with workers.

Pillar	Reference	Conforming
Social Accountability	5.3.4	Yes

Clause and Explanation**Clause:**

Facilities shall comply, at a minimum, with national laws regarding meal and rest breaks during work shifts. Facilities shall respect all workers right to a rest day after six consecutive days worked.

Explanation:

Plant follows strict lunch time as required by Law and Maintains a good Employee – Employer relationship, the facility is providing total break time of 60 minutes for lunch / food break for general shift employees and 30 minutes for shift working employees. These are mandatory requirements as required by National Labor Law and cannot be violated. Plant is in compliance with the requirement.

Pillar	Reference	Conforming
Social Accountability	5.3.5	Yes
Clause and Explanation		

Clause:

Facilities shall maintain records that verify compliance with working hour laws, overtime, meal and rest breaks, and termination for all workers including, but not limited to, piece rate workers, contractors/subcontractors, hourly, salaried and temporary workers.

Explanation:

Records are available during the audit and are maintained properly by HR department duly signed by Factory Manager. Record of leave application and leave approval for employee were maintained and also leave taken by the employee was maintained.

Pillar	Reference	Conforming
Social Accountability	5.4.1	Yes
Clause and Explanation		

Clause:

All work, including overtime, shall be voluntary, and shall not be under threat of any penalty or sanctions.

Explanation:

There is no penalty for for the absence. There is no evidence of such resistance or other enforcements. This was seen evidenced when the employees were leaving the plant after the shift without any resistance of movement. There are no identity papers been held by the company. Overtime is voluntary and if done is compensated double the normal wages. Records review and interview with workers found satisfactory.

Pillar	Reference	Conforming
Social Accountability	5.4.2	Yes
Clause and Explanation		

Clause:

The facility shall not engage in any form of forced or indentured labor including prison labor. This includes human trafficking, the confiscation or holding of original identity papers and other valuable possessions, hampering or preventing the renewal of travel or identification documents, and other means of coercion intended to force anyone to work.

Explanation:

Bonded labour is prohibited as per as company policy, and the facility is following the same, no deposit, bond or other financial guarantees from the workers side is not practiced by the facility. Appointment orders issued to all the employees and the same has been confirmed during Interviews and personal files verification.

Pillar	Reference	Conforming
Social Accountability	5.4.3	Yes
Clause and Explanation		

Clause:

Bonded labor shall be prohibited. The facility shall not require the payment of deposits, bonds or other financial or collateral guarantees that may result in debt bondage. This includes recruitment fees, fines, and deductions from wages, and withholding of pay that are not part of a written contractual agreement with the employee.

Explanation:

Bonded labour is prohibited as per as company policy, and the facility is following the same, no deposit, bond or other financial guarantees from the workers side is not practiced by the facility. Appointment orders issued to all the employees and the same has been confirmed during Interviews and personal files verification.

Pillar	Reference	Conforming
Social Accountability	5.4.4	Yes
Clause and Explanation		

Clause:

Workers shall have the right to leave the premises after their work shift. Workers shall also have the right to terminate their employment after reasonable notice. Facility shall not otherwise unreasonably restrict workers' freedom of movement including but not limited to surveillance during rest or non-work hours, during transportation or in dormitories provided by the facility.

Explanation:

Facility maintains good employee relationships. There is no evidence of such resistance or other enforcements. This was evidenced when the employees were leaving the facility after the shift work without any resistance of movement. Workers can decided to terminate thier own employment with a notice period of one month for workers and notice period of one month for the staff. The same has been confirmed during Interview process.

Pillar	Reference	Conforming
Social Accountability	5.4.5	Yes
Clause and Explanation		

Clause:

The facility shall have the information regarding hot-lines, competent authorities, and other resources for victims of labor rights abuse displayed prominently for ease of access to workers and also provided to jobseekers.

Explanation:

During site visit and Interview with employees confirmed that contact details and phone numbers for escalation of grievances has been displayed in the noticed board for workers understanding and ready reference.

Pillar	Reference	Conforming
Social Accountability	5.5.1	Yes
Clause and Explanation		

Clause:

The facility shall not engage in or support the use of child labor. The facility shall comply with local child labor laws regarding minimum working age, or the age of compulsory education, or, the ILO Minimum Age Convention 138, whichever is higher. While ILO Minimum Age Convention 138 states the minimum age shall be 15, local or national law of minimum age of 14 may apply if it is in accordance with developing nation's country exceptions under this convention. The facility shall collect, verify, and retain age related records of workers to confirm that the age requirements are met.

Explanation:

Child Labour policy and child labour remediation procedure is available. 10 employee personal files checked at random and minimum age of employment is more than 18 years. Plant does not employ people less than 18 years. Age verification is done by Govt. issued ID cards such as Aadhar Card, Election ID card or PAN card, School certificate.

Pillar	Reference	Conforming
Social Accountability	5.5.2	N/A
Clause and Explanation		

Clause:

The employment of young workers (above the minimum age but under 18 years old) shall be in compliance with local or national laws, including required access to compulsory education and any restrictions on hours and time of day.

Explanation:

Not applicable. No worker below 18 years age is employed.

Pillar	Reference	Conforming
Social Accountability	5.5.3	N/A
Clause and Explanation		

Clause:

Young workers shall not be subjected to conditions which compromise their health, safety, or moral integrity, or which harms their physical, mental, spiritual, moral or social development. This includes restrictions on working hours and prohibiting night work and hazardous work.

Explanation:

Not applicable. No worker below 18 years age is employed.

Pillar	Reference	Conforming
Social Accountability	5.5.4	Yes
Clause and Explanation		

Clause:

The facility shall have in place procedures for support to anyone identified as a child laborer in the facility. Depending on the age of the child, support must include at a minimum removal and reintegration into education (for children below the minimum age and/or children who have not completed basic education and/or changing job functions for young workers above the minimum age to non-hazardous tasks).

Explanation:

Child labour policy and child labour remediation procedure is in place. Employee personal files checked at random and minimum age of employment is more than 18 years. Plant does not employ people less than 18 years. Age verification is done during the recruitment with original Age proof of ID card.

Pillar	Reference	Conforming
Social Accountability	5.6.1	Yes
Clause and Explanation		

Clause:

Workers shall have a legal right to work in the country they are working in. Work performed and terms of employment shall be in compliance with local law, national or international labor standards, whichever is stricter. Records shall be collected, verified and retained to document right to work documents.

Explanation:

The facility is having documented Workers Right, Recruitment Policy. All the workers are employed by the company directly and by the contractor. Labour Contract documents are checked and verified in which it is clearly mentioned about the legal right, terms and conditions of the employment which are compliance with local law. Facility provides for equal opportunity, company policy is documented.

Pillar	Reference	Conforming
Social Accountability	5.6.2	Yes
Clause and Explanation		

Clause:

The facility shall provide to all workers, prior to hire (jobseekers) and during employment, with written and understandable information regarding the terms and conditions of employment, worker's rights, benefits, compensation, expected working hours, details of wages for each pay period each time they are paid, and facility policies regarding disciplinary actions, grievance procedures, any authorized deductions from pay, physical work, environment and housing, and similar. This information shall be provided in appropriate language of the employees. This requirement shall apply to jobseekers and all workers regardless of status, including but not limited to hourly, salary, piece rate, temporary and seasonal workers.

Explanation:

Appointment letter issued to all employees of the company. The Facility has recruited the worker's directly. List of Holidays displayed for the year 2022 in the notice board. Verified the list of holidays for the year 2023 as well. The information regarding the workers' rights, working hours, Benefits, compensation & company policy etc. are provided in standing order & displayed in English & Local language in the notice board. Appointment letters given to each employee in 2 languages. The authorised deductions in salary, and information regarding the environment and housing, Leave, Benefits etc are clearly mentioned in the appointment letter

Pillar	Reference	Conforming
Social Accountability	5.6.3	Yes
Clause and Explanation		

Clause:

Where contracted/subcontracted or temporary workers are hired through a labor recruiting agency or employment service, the facility shall ensure that these services provide all the information cited at clause 5.6.2 prior to and during hire, in appropriate languages, to ensure workers are aware of their rights and conditions of employment as described above.

Explanation:

Subcontracted workers have been provided with an employment contract in the local language. A copy of the same is maintained by the facility.

Pillar	Reference	Conforming
Social Accountability	5.6.4	Yes
Clause and Explanation		

Clause:

All labor recruiting agencies or employment services used by the facility must be licensed to operate by the local or national government as a labor provider. Jobseekers and workers shall not have been subject to recruitment practices that employ threats, penalties, coercions, physical force, or fraud.

Explanation:

Agreement with contractors

Sona Enterprises dated 21 Apr 2022 valid for two years. Licence from Govt of Andhra Pradesh Labour Department - Interstate Migrant Workmen (RE and CS) Act, 1979 (Licence of Contractor establishment) for 300 workers 21/04/2022 valid till 22/12/2023

Nazal Enterprises - Agreement valid from 01 Dec 2022 valid until terminated. - Licence valid upto 03/01/2024

Sachin Engineering Works - Agreement valid from 01-Aug-2023 for two years. licence valid upto 29/08/2024

Contractors are paid 10% of earned wages - e.g. Sona Enterprises - net wages paid 1090109 for 109 workers - Service charges - (Rs 1200100-1090109)

Pillar	Reference	Conforming
Social Accountability	5.6.4.A	N/A

Clause and Explanation**Clause:**

Please input average fees paid to labor recruiting agency per worker in USD (United States Dollar)

Explanation:

12.1577318448104

Pillar	Reference	Conforming
Social Accountability	5.6.4.B	Yes

Clause and Explanation**Clause:**

Please input the name(s) of the labor recruiting agency(ies) -

Explanation:

Sona Eterprises
Nazal Enterprises

Pillar	Reference	Conforming
Social Accountability	5.6.5	Yes

Clause and Explanation**Clause:**

The facility shall document the agencies used to recruit, hire, and/or employ workers, in addition to any known fees paid by or debts accrued by jobseekers and employees in order to secure employment. Starting January 1, 2025, the Seafood Processing Standard shall apply in full the Employer Pays Principle. GAA will provide further clarifications for the requirements of this principle in advance of its implementation.

Explanation:

Refer 5.6.4

Pillar	Reference	Conforming
Social Accountability	5.7.1	Yes

Clause and Explanation**Clause:**

The facility shall provide for equal opportunity with respect to recruitment, hiring, terms of employment, compensation, access to training, promotion, termination or retirement.

Explanation:

The facility is having documented Recruitment Policy, Disciplinary action Policy, Discrimination Policy. Facility provides for equal opportunity to the workers with respect to recruitment, compensation, access to training, promotion, termination or retirement. company policy is documented.

Pillar	Reference	Conforming
Social Accountability	5.7.2	Yes
Clause and Explanation		

Clause:

The facility shall not engage in or permit discrimination in all aspects of employment, including but not limited to recruitment, hiring, compensation, terms of employment, discipline, access to training, promotion, termination, or retirement on the basis of race, color, gender, national origin/ heritage, religion, age, nationality, social or ethnic origin, maternity, sexual orientation, political opinion, disability or any other status. Terms and conditions of employment shall be based upon the ability to do the job, not on personal characteristics or beliefs.

Explanation:

There is a ban on discrimination Policy. During site visit, interview with workers and discussion with HR team there is no discrimination observed. During Interview with employees and verification of personal files, training records, promotion letters etc. it is evident that there is no discrimination noticed.

Pillar	Reference	Conforming
Social Accountability	5.7.3	Yes
Clause and Explanation		

Clause:

The facility shall treat job seekers and workers with dignity and respect and not engage in or permit physical, verbal or sexual abuse, bullying or harassment.

Explanation:

Such act of behavior is not entertained, as the Plant Management maintains good, healthy and harmonious working environment and employment conditions.

Pillar	Reference	Conforming
Social Accountability	5.7.4	Yes
Clause and Explanation		

Clause:

The facility shall have a written disciplinary procedure made available in appropriate language of the workers. Records shall be maintained of all disciplinary actions.

Explanation:

Yes, Available. In HR Manual. Facility is having documented disciplinary procedure and the same has been displayed in English & Telugu. No disciplinary actions are made for the workers by the facility

Pillar	Reference	Conforming
Social Accountability	5.7.5	Yes
Clause and Explanation		

Clause:

The facility shall not terminate employees for pregnancy, force the use of contraception, or reduce wages after maternity leave. Job seekers and workers shall not be subjected to pregnancy or virginity testing.

Explanation:

During Interview with employees it is confirmed that facility does not terminate employees for Pregnancy and there is no pregnancy test conducted for female employees and no practice of reducing salary after meternity leave.

Pillar	Reference	Conforming
Social Accountability	5.7.6	Yes
Clause and Explanation		

Clause:

The facility shall have in place an established complaints and remediation system to handle cases and allegations of sexual abuse/harassment, bullying or discriminatory practices for both the jobseekers and workers. This shall, at a minimum, include a confidential reporting mechanism, information on any hot-lines or other outside services available, and the possibility of initiating an independent assessment/arbitration.

Explanation:

4 Complaint Box Provided. Facility has displayed the staff list in the notice board for escalation of Grievences. There is a greivence redressal committee for resolution of workers complaints if any. During Interview with employees it is confirmed that there is no such practice noticed by them in this facility.

Pillar	Reference	Conforming
Social Accountability	5.8.1	Yes
Clause and Explanation		

Clause:

Facilities shall respect the rights of workers to associate, organize, and bargain collectively (or refrain from doing so) without the need of prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retaliate against workers exercising their right to representation in accordance with international labor standards.

Explanation:

The right to freedom of association and collective bargaining is not prohibited by law. Hence the facility has not explored alternative means of worker representation and negotiation. There is a Works committee consisting of nominated mangement representatives and elected worker representatives. Meetings have been conducted once in 2 months. Last two meetings were conducted on 21.08.2023 and 05.06.2023.

Total 12 members - 7 nominated management representatives. Worker representatives - 11 members initially in the committee but at present only 5 remaining as 6 representatives have left the job.

Pillar	Reference	Conforming
Social Accountability	5.8.2	N/A
Clause and Explanation		

Clause:

Where the right to freedom of association and collective bargaining is prohibited or restricted under local or national law, the facility shall not prevent alternative means to facilitate worker representation and negotiation (for example, the election of one or more workers by other workers to represent them to management).

Explanation:

The right to freedom of association and collective bargaining is not prohibited by law.

Pillar	Reference	Conforming
Social Accountability	5.8.3	Yes
Clause and Explanation		

Clause:

The facility shall grant worker representatives access to the workplace in order to carry out their representative functions.

Explanation:

The facility has granted worker representatives access to the workplace in order to carry out their representative functions. Both from Management and workers section are having good communication to manage Healthy and Harmonious work environment which is evident through the meeting and interviewing during the audit.

Pillar	Reference	Conforming
Social Accountability	5.8.4	Yes
Clause and Explanation		

Clause:

The facility shall have a written worker grievance process/procedure and make it available to all workers, that allows for the anonymous reporting of grievances to the management without fear of retaliation.

Explanation:

The facility is having documented Grievance procedure and also Grievance redressal procedure was found indetailed about anonymous reporting.

Grievance Committee meeting - (Once in Three months), 19 April 2023 and 10 July 2023.

No specific grievance reported.

The anonymous reporting practice is carrying out through suggestion box which are placed at change room and rest rooms with locked condition. Grievance redressal committee meeting conducted and minutes of meeting and follow up records are properly documented

Pillar	Reference	Conforming
Social Accountability	6.1.1	Yes
Clause and Explanation		

Clause:

The facility shall provide safe, healthy and clean conditions in all designated work, rest, dining, and, where applicable, housing areas, and shall establish and follow a clear set of procedures that ensures occupational health and safety. This includes providing potable water, sanitary toilet facilities, and, where applicable, clean kitchen and food storage areas.

Explanation:

The Plant provides clean Rest Areas and Dining facilities with Hygienic arrangement for food storage to the workers. Employee eating areas are clean and hygienic. The dining hall is situated away from the processing area and is well maintained. Accomodation for girl workers are provided inside the premices. Regular cleaning monitoring is being done in rest areas by the sanitary supervisors under the supervision of QC personnel. Toilets and basic facilities are provided in the dormitory. Facility also Provided drinking water to all employees and readily accessible. The water is available outside the processing area. Separte drinking water points identified.

Pillar	Reference	Conforming
Social Accountability	6.1.2	Yes
Clause and Explanation		

Clause:

If provided or mandated by the facility or employment agency/labor broker, employee housing shall meet local and/or national standards including but not limited to safe, watertight structures, adequate space as per occupational load for the facility, heating/ventilation/cooling, pest control, sink, shower and toilet facilities.

Explanation:

Employee housing is provided for girls and boys separately and they are meeting standard requirements like elevated bedding in water tight structures. In female dormitory there are totally wherein 150 female employees are found staying and male dormitory there are totally wherein 60 male employees are found staying. It was observed during the site visit that they were maintained clean and hygienic. Washrooms and Toilets have been provided.

Pillar	Reference	Conforming
Social Accountability	6.1.3	Yes
Clause and Explanation		

Clause:

The facility shall have a sufficient number of toilets and sinks in compliance with local and national laws. These shall be readily accessible to employees and kept in good repair.

Explanation:

Ref. 3.1.1. Toilets are maintained clean and in good condition. The toilets are not locked and are within the factory premises easily accessible to workers. Toilets for Males 08 and 40 Toilets for ladies hostel. Sinks in good condition is available and readily accessible to employee, under supervising control of Hostel Warden..

Pillar	Reference	Conforming
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Social Accountability	6.1.4	Yes
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Clause and Explanation

Clause:

The facility shall provide a safe and hygienic place for workers to change into appropriate work attire and to store personal belongings that is secure and accessible to workers without delay or payment to access.

Explanation:

Facility has provided separate change room for both male and female workers for each section such as raw material receiving, pre-processing, procesing & IQF section to change into appropriate work attire and to store personal belongings and maintained hygienic conditions.

Pillar	Reference	Conforming
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Social Accountability	6.1.5	Yes
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Clause and Explanation

Clause:

If meals are provided, they shall be safe, wholesome and commensurate with local eating customs.

Explanation:

Facility is providing free accomodation & meals to all employees including the one staying in the hostel and day scholars as well. This meals is wholesome and commensurate with local eating customs and same is observed during site tour.

Pillar	Reference	Conforming
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Social Accountability	6.2.1	Yes
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Clause and Explanation

Clause:

The facility shall appoint a senior management person responsible for ensuring worker health, safety and training.

Explanation:

The facility has appoint a senior management person responsible for ensuring worker health, safety and training.

Name Mr. Sre 

Pillar	Reference	Conforming
Social Accountability	6.2.2	No - Minor
Clause and Explanation		

Clause:

The facility shall identify, prevent, eliminate or minimize any workplace health and safety hazards. This includes a requirement for documenting incidents, and investigations of accidents and their cause and correction.

Explanation:

Plant's safety hazards are covered under Emergency Management Procedure. Facility has made an Risk Assessment for workers workplace health & safety hazards done. CCCIII/EHS/01

Incident investigation records are available where no major accident reported, only some minor accident reported and provided the First Aid treatment adequately.

Minor NC

During sampling of boxes from a top rack in the cold room, one cold room worker stood on the forklift arm with pallet at height without any fall protection equipment.

Pillar	Reference	Conforming
Social Accountability	6.2.3	Yes
Clause and Explanation		

Clause:

The facility shall ensure proper measures for fire protection and prevention in all work, rest, dining, and where applicable, housing areas. This includes but is not limited to: provision of sufficient number of smoke detectors and/or fire alarms; adequate numbers of functioning fire extinguishers as per legal requirement; sufficient number of emergency exits (including provision of appropriately designed emergency stairwells on multi-story buildings to support evacuation of personnel); provision of fire hydrant and evacuation routes that are clearly marked, properly lit, kept clear and unlocked while employees are present; proper training and enforcement for handling of flammable liquids and chemicals; and procedures to prevent fires during such activities as welding.

Explanation:

Facility taken proper measures for fire protection like adequate number of functioning fire extinguishers (32 nos) and fire hydrants at 48 locations, providing emergency exits and marking them properly.

provision of sufficient number of and adequately functioning

Smoke detectors and/or fire alarms;

Fire extinguishers as per legal requirement;

Provision of fire hydrant and evacuation routes that are clearly marked, properly lit, kept clear and unlocked while employees are present;

Proper training and enforcement for handling of flammable liquids and chemicals; and procedures to prevent fires during such activities as welding.

Sufficient number of emergency exits (including provision of appropriately designed emergency stairwells on multi-story buildings to support evacuation of personnel);

Pillar	Reference	Conforming
Social Accountability	6.2.4	Yes

Clause and Explanation**Clause:**

Facilities shall ensure that equipment and machinery are safe through, but not limited to: properly functioning shields or guards; warning signs/pictures; emergency shut-off switches; and implementation of lock-out/tag-out procedures to prevent start-up during maintenance.

Explanation:

Adequate safety procedures and systems are in place including proper equipments and machinery maintenance. Electrical fitting are found satisfactory. Motor are properly safeguarded, Warning Signs are properly pasted all required locations.

Pillar	Reference	Conforming
Social Accountability	6.2.5	Yes

Clause and Explanation**Clause:**

Facilities shall ensure the strength, stability and safety of buildings and equipment in work, eating and, where applicable, housing areas. This includes but is not limited to structural welding/fastening, ensuring electrical safety through proper wiring, grounding of cables, and coverage of circuit boxes.

Explanation:

Yes, available. Building Stability Certificate verified. Refer Clause 1.2.1 Grounding of electrical equipments is mandatory as per local electrical inspectorate and plant is in compliance with the requirement

Pillar	Reference	Conforming
Social Accountability	6.2.6	Yes

Clause and Explanation**Clause:**

Emergency evacuation drills (in case of fire, chemical leak or similar) shall be conducted, at a minimum, annually, to include all shifts and floors, and conducted jointly with other occupants in the building. Drills should be conducted similarly in housing facilities. The frequency of fire and evacuation drills shall be documented and verified.

Explanation:

As per Fire NOC mock drills are to be conducted once in 06 months.
Mock drill for emergency preparedness verified dated 16.03.2023 for
Fire evacuation and Fire fighting - entire processing area including staff and personnel residing in dormitory. Time taken for evacuation 120 seconds.

Pillar	Reference	Conforming
Social Accountability	6.2.7	Yes

Clause and Explanation

Clause:

An emergency response plan shall be prepared for serious illnesses or accidents, natural disasters or other incidents.

Explanation:

Emergency response plan is available on onsite SOP/053

Emergency Response Plan manual which authorized by Factory Head. Covering emergencies such as Ammonia leakage, fire,, bomb threats or bio terrorism, water and power disruption, worker unrest, weather related etc.

Pillar	Reference	Conforming
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Social Accountability	6.2.8	Yes
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Clause and Explanation


Clause:

Select workers shall be trained in the details of the emergency response plans and in first aid (to include electrical shock, profuse bleeding, drowning and other possible medical emergencies). A list of the trained workers shall be available. At least one of the trained workers shall be present at the facility while it is in operation or maintenance.

Explanation:

There are 08 number of first aid boxes in place.

First aid training record verified dated 30 first aiders -

Conducted from Red Cross Society.. Dr. Pa 

The list of first aiders has been displayed near the first aid boxes.

Pillar	Reference	Conforming
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Social Accountability	6.2.9	Yes
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Clause and Explanation

Clause:

The facility shall limit worker exposure to sound in excess of 85 dB to less than eight hours a day or apply a stricter national standard.

Explanation:

Noise monitoring conducted annually.

Done for both day and night for External and intenal area and found maximum level 83.6 dB verified.

Pillar	Reference	Conforming
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Social Accountability	6.3.1	Yes
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Clause and Explanation

Clause:

Safe, appropriate and hygienic protective gear shall be provided, free of charge, to workers commensurate with work activity.

Explanation:

Yes. For each assigned task in the process plant, appropriate uniforms with different colour code for pre-processing & processing operation is available. Protective gear includes, clean uniforms, gloves, hair nets, mouth and nose mask, rubber boots etc., in pre-processing and processing operations. For workers working in cold store & packing area, the additional clothing is provided like monkey cap, overcoats, woolen gloves etc. For workers working in maintenance section, the additional safety shoes, ear protectors, rubber gloves, helmet, mask etc are provided in adequate number.

Pillar	Reference	Conforming
Social Accountability	6.3.2	Yes
Clause and Explanation		

Clause:

Appropriate PPE shall be given to workers based on risk assessment considering the work operations within the facility.

Explanation:

Facility has provided appropriate PPE to workers based on the risk assessment considering the operations.

Pillar	Reference	Conforming
Social Accountability	6.3.3	Yes
Clause and Explanation		

Clause:

The facility shall list, control the issue of, and ensure the proper use of protective equipment and clothing provided to employees, contractors, and visitors (such as smocks, eye protection, gloves, insulated wear for refrigerated areas, boots for wet areas, etc.)

Explanation:

The welding gloves, electrical safety gloves, Eye protection, ammonia mask, Self contained breathing apparatus etc. are provided to maintenance & machine room staff. The cold room area workers have been provided with winter clothing and it was evident during the site visit. List of records are maintained by HR officer and general store in-charge. The Stock register and issue register has been verified during site visit and found well maintained.

Pillar	Reference	Conforming
Social Accountability	6.4.1	Yes
Clause and Explanation		

Clause:

The facility shall provide adequate medical care for employees, including access to or communication with medical authorities in case of emergencies or accidents.

Explanation:

Agreement with KIMs Hospital - 6 km - emergencies, regular checkups, ambulance service valid from 01 May 2022 for two years.

Doctor assigned is Mr. Ka [REDACTED] Reg no. [REDACTED]

Pillar	Reference	Conforming
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Social Accountability	6.4.2	Yes
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Clause and Explanation**Clause:**

Facilities shall record the basic medical care provided by their facility.

Explanation:

As detailed above. The Control of Employee Health Condition procedure is documented

Ref: SSOP/01

The company provides basic medical care within the facility. First aid kits are readily available at various locations in the factory. The facility is having trained personnel on first aid to take care of workers in case of any medical need. They take the workers to a nearby hospital (3 Km away from the facility). Agreement with hospital verified. Contract letter verified. Vehicle provided round the clock to take workers to the hospital. Contact numbers are displayed to gain access to medical authorities. ESI for all workers seen. Diagnosis register for worker is available during the audit. The facility also provided separate room for doctor. Verified the Health cards of 12 members. Typhoid and Tetanus Toxoid found satisfactory.

Pillar	Reference	Conforming
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Social Accountability	6.4.3	Yes
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Clause and Explanation**Clause:**

First aid kits shall be readily available to employees close to work and rest areas. First aid kits shall be sealed to prevent contamination from the working environment.

Explanation:

First aid kits are available to employees close to work and rest areas such as Machine room, Security room, Office room, Processing area, Dormitories etc.

Pillar	Reference	Conforming
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Social Accountability	6.4.4	Yes
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Clause and Explanation**Clause:**

The facility shall maintain a list of first aid items kept on hand and, where appropriate, their expiration date and any expired content shall be replaced.

Explanation:

List of First Aid Items are available at the First Aid Kits in all the location. The lists are also maintaining the expired date of all items. All the items in all First Aid Kits are with due valid date.

Pillar	Reference	Conforming
Social Accountability	6.5.1	Yes
Clause and Explanation		

Clause:

The facility shall have a documented training program for workers and maintenance personnel that operate or work on machinery and/or other dangerous equipment. Such training shall include but is not limited to boiler operators, welders, forklift drivers and those that operate or work on, or clean cutting, peeling, sorting and other potentially dangerous machinery. Where local law requires workers to be licensed to operate or maintain such items, proof of licensing shall be maintained.

Explanation:

Training procedure is documented in CCCIII/SOP/18.

Company has appointed adequately trained, experienced and competent staffs and deputed at key positions whose activity effects product safety, legality and quality. Annual training planner for the year 2023 is in place CCCIII/DOC/41 covering all training topics.

rainings are conducted on a monthly basis and for new workers in terms of induction training. Machinery and Maintenance people trained in maintenance and work safety and training requirements and training scope and attendance recorded verified. Interviewed with workers and found satisfactory.

Pillar	Reference	Conforming
Social Accountability	6.5.2	Yes
Clause and Explanation		

Clause:

The facility shall have a training program to ensure workers that handle or are exposed to potentially dangerous chemicals, fuels, compounds, or other toxic substances are properly trained in their safe use. (See also 7.2.4).

Explanation:

Training on the handling of chemicals and hazardous materials has been conducted on 17/08/2023 Internally during when 25 employees have been trained.

Pillar	Reference	Conforming
Social Accountability	6.5.3	Yes
Clause and Explanation		

Clause:

The facility shall maintain a training program that orients new employees in general health, safety, product quality and the prevention of product contamination. The facility shall also provide refresher training to all employees on these subjects at least annually.

Explanation:

Ref. - 6.5.1, The induction trainings are conducted for all new employees on a monthly basis covering general health, safety, product quality and prevention of product contamination. For the existing employees the refresher training is conducted once in a year.

Pillar	Reference	Conforming
Social Accountability	6.5.4	Yes
Clause and Explanation		

Clause:

Training programs shall include specific requirements that verify the effectiveness of the training and that training programs are being effectively transferred to the workplace. The results of such assessments must be documented and available at least for those tasks which have an impact to the product safety, quality, legality, and human health and safety.

Explanation:

Ref. - 6.5.1 & 6.5.3, Training programme schedule is prepared by the senior management and the effectiveness is regularly reviewed by QA Manager.

Pillar	Reference	Conforming
Social Accountability	6.5.5	Yes
Clause and Explanation		

Clause:

The facility shall maintain a training program for all employees related to fire safety and electrical safety, including use and disposal of dangerous materials.

Explanation:

Facility maintains training programme for all employees related to Fire safety, electrical safety. Last first aid training has been conducted through Andhra Pradesh Fire & Rescue Department, AP on 13/10/2022 during when 20 employees have been trained.

Also training dated 27-03-2023 to 31-03-2023 for 21 personnel - Three Dasi Basic Fire Safety and First Aid Fire Fighting Training Course for 20 personnel

Pillar	Reference	Conforming
Social Accountability	6.5.6	Yes
Clause and Explanation		

Clause:

The facility shall have an effective training program for all personnel on the personal hygiene standard and program and records of training shall be maintained.

Explanation:

The facility has a training program for all personnel on the personal hygiene (dated 26.09.2023) and sanitation and records of training are maintained.

Pillar	Reference	Conforming
Social Accountability	6.5.7	Yes
Clause and Explanation		

Clause:

All Employees shall be trained in the facility's sanitation SSOPs. Record of such training shall be maintained in accordance with the facility's record retention policy.

Explanation:

Facility has training on sanitation SSOPs and the training conducted on 24-09-2023 by QC team during when 19 employees have been trained.

Pillar	Reference	Conforming
Social Accountability	6.5.8	Yes
Clause and Explanation		

Clause:

Records that verify proper training for all elements described above shall be maintained.

Explanation:

Yes. Records maintained with retention period of 3 years.

Pillar	Reference	Conforming
Environmental	7.1.1	Yes
Clause and Explanation		

Clause:

Chemical products, fuels, lubricants and other non-food grade and/or toxic compounds shall be properly labeled.

Explanation:

Chemical products, fuel, lubricants and other non-food grade and/or toxic compounds are properly labelled and stored in lock & key

Pillar	Reference	Conforming
Environmental	7.1.2	Yes
Clause and Explanation		

Clause:

Used chemical containers shall not be reused in production or to store potable water, raw material, ingredients, packaging or other edible substances.

Explanation:

Used chemical containers are disposed off to licensed waste collection contractor and not re-used anywhere in the plant. Such used containers are properly stored in an allocated space, under Supervisor control and securely stored prior to disposal. Confirmed the same during the site visit

Pillar	Reference	Conforming
Environmental	7.1.3	Yes
Clause and Explanation		

Clause:

Chemical products, fuel, lubricants and other non-food-grade and/or toxic substances shall be securely stored in locked containers in areas that are away from kitchens, employee rest areas, and food production, packing and storage areas.

Explanation:

Yes. Chemical products, fuel & lubricants are stored separately away from food production, packing and storage areas. Storage of non-food grade substances was found in locked condition in Main plant and under supervisor control.

Pillar	Reference	Conforming
Environmental	7.1.4	Yes
Clause and Explanation		

Clause:

All items listed in 7.1.3 shall be safely stored to prevent mixing or water contamination that would result in noxious gases, explosions or other worker or food safety hazards. The storage area shall be well-ventilated and water-tight.

Explanation:

Yes. Chemical products storage is safe and secured preventing any water contamination or other worker safety hazards. The storage area is well-ventilated and water-tight.

Pillar	Reference	Conforming
Environmental	7.1.5	Yes

Clause and Explanation**Clause:**

Secured storage areas for the items listed in 7.1.3 shall be under the control of designated responsible personnel.

Explanation:

Secured storage areas for Chemical products, fuel, lubricants and other non-food-grade and/or toxic substances are under the control of designated responsible personnel.

Pillar	Reference	Conforming
Environmental	7.1.6	Yes

Clause and Explanation**Clause:**

Fuel, oil and lubricant storage shall include secondary containment areas to contain possible spills. The containment shall be equal to or greater than 110% of the capacity of the containers present at the facility.

Explanation:

Yes. Found stored with proper precaution & no signs of spillage were seen at all locations. Secondary containment for fuel (Diesel) storage areas was found adequately design to restrict all spills near the generator room.
The containment facilities observed to be adequate i.e. greater than 110% of the capacity of the containers present at the facility.

Pillar	Reference	Conforming
Environmental	7.1.7	Yes

Clause and Explanation**Clause:**

Fuel, lubricant and chemical storage and maintenance areas shall be marked with warning signs as appropriate (e.g. "authorized personnel only", "flammable", "no smoking", "danger").

Explanation:

"Warning signs" on Fuel, lubricant and chemical storage, maintenance and other sensitive areas are evident like "flammable", "no smoking", "danger".

Pillar	Reference	Conforming
Environmental	7.1.8	Yes

Clause and Explanation**Clause:**

Precautions shall be taken to prevent spills, fire and explosion. Equipment and materials for managing and cleaning up spills shall be readily available. Employees working in such areas shall be trained in proper clean up procedures and in personal protection.

Explanation:

Precautions were taken to prevent spills, fire and explosion in most of the location in the facility. Employees working in the respective areas are trained in proper clean up procedures and in personal protection maintained. Chemical room where bulk storage of salt, Chlorine was also noted with precautionary instruction in local language, Protective Equipments were available and Eye washing facility was seen where proper display is pasted for understanding of workers who will be handling with chemicals.

Training on the handling of chemicals and hazardous materials has been conducted on 17/08/2023 Internally during when 25 employees have been trained.

Pillar	Reference	Conforming
Environmental	7.2.1	Yes
Clause and Explanation		

Clause:

Sewage from the facility shall be adequately controlled to avoid contamination of the environment, food production areas, employee rest and housing areas, and water supply. It shall be properly treated through a municipal or plant sewer system.

Explanation:

The Facility has sufficient sewage treatment capacity inside the premises. The sewage is collected and treated in the ETP In the plant. This process is adequately controlled to avoid contamination of the environment, food production areas, employee rest and housing areas, and water supply which was physically verified during site visit. The treated water is used for the own irrigation.

Pillar	Reference	Conforming
Environmental	7.2.2	Yes
Clause and Explanation		

Clause:

Solid waste, waste water in plant production areas and on the plant grounds shall be properly stored and disposed of according to local laws and regulations. (This includes processing by-products such as heads, shells, bones, viscera, etc., and used packing materials). Such waste shall be disposed of to avoid negative impacts on the community and according to national environmental standards.

Explanation:

Yes. Did not notice any used packing material or by-products accumulation during plant visit. There was no evidence of such accumulation also. Indicates proper and frequent removal in plant production area. Disposal is done through licensed contractors. Waste removal- Agreement with M/s KLS - Dated 7 June 2022 valid for 3 years. Chitin Manufacturer- APPCB licence dated 04.03.2021 valid up to 7 years. Shell waste is used non-feed operation; material lifted on daily basis, records of daily disposal CCCIII/REC/37 is available in Material found kept in the dedicated room, applicable regulatory requirements are fulfilled.

Pillar	Reference	Conforming
Environmental	7.2.3	Yes
Clause and Explanation		

Clause:

Used chemical and fuel containers, waste oil, lubricants, and expired chemicals and ingredients shall be disposed of in accordance with manufacturer's instructions and local government environmental regulations. The facility shall maintain copies of relevant and up-to-date regulations.

Explanation:

It was confirmed during the site visit that the used chemical containers, waste oil have been disposed off to PCB authorised vendor. Procedure details activity and frequency in Work Instruction: Plant Cleanliness. Did not observe any accumulated wastes. The waste is collected in separate dedicated room & removed on daily basis in accordance with manufacturer's instructions and local government environmental regulations. Combined Consent order verified.

Pillar	Reference	Conforming
Environmental	7.2.4	Yes
Clause and Explanation		

Clause:

Facility personnel responsible for storage, transport and disposal of the items listed in 7.2.2 and 7.2.3 shall be appropriately trained to prevent personnel and food safety hazards as well as potential environmental contamination.

Explanation:

Ref. - 7.2.3, Plant Manager and store In-charge are responsible for storage, transport and disposal of the items. Store In-charge is well trained to prevent personnel and food safety hazards as well as potential environmental contamination.

Pillar	Reference	Conforming
Environmental	7.2.5	Yes
Clause and Explanation		

Clause:

Where the local government requires a license or permit for the waste storage and disposal activities described in 7.2.2 and 7.2.3, the facility shall have a current copy of the plant's or their service provider's permit or license.

Explanation:

Combined Consent order for operation verified.
Also verified license of waste disposal contractors

Pillar	Reference	Conforming
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Animal Welfare	8.1.1	N/A
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Clause and Explanation

Clause:

Animals shall be transported to processing plants or other markets in a manner that assures a high level of animal welfare and minimizes distress.

Explanation:

Not applicable. No live animals handled

Pillar	Reference	Conforming
Animal Welfare	8.1.2	N/A

Clause and Explanation

Clause:

If animals are hauled live to a processing plant, transport must be implemented without undue delay, and the time and stocking density controlled to provide optimum survival and product quality. These shall include, where necessary, adequate clean water, dissolved oxygen levels and temperature control.

Explanation:

Not applicable. No live animals handled

Pillar	Reference	Conforming
Animal Welfare	8.1.3	N/A

Clause and Explanation

Clause:

Adequate dissolved oxygen levels shall be maintained. Transport density shall be determined by local conditions, these transport provisions shall apply equally to all suppliers, plant employees and subcontractors.

Explanation:

Not applicable. No live animals handled

Pillar	Reference	Conforming
Animal Welfare	8.2.1	N/A

Clause and Explanation

Clause:

If animals are held live at processing plants prior to slaughter holding conditions shall be operated to assure adequate

animal welfare. These shall include, where necessary, adequate clean water, dissolved oxygen levels and temperature control.

Explanation:

Not applicable. No live animals handled

Pillar	Reference	Conforming
Animal Welfare	8.3.1	N/A
Clause and Explanation		

Clause:

If animals are slaughtered at the processing facility, before slaughter, they shall be quickly rendered unconscious by humane means.

Explanation:

Not applicable. No live animals handled

Pillar	Reference	Conforming
Traceability	9.1.1	Yes
Clause and Explanation		

Clause:

Facilities that source raw material from both wild-caught and farm-raised sources shall properly identify, segregate and label products from different wild-caught and/or aquaculture sources and shall indicate any relevant certifications.

Explanation:

Only Aquacultured material in the Scope. The facility has contract with BAP Certified Farms Product traceability procedure (CCCIII/SOP/13) developed and available for reference. It includes all the requirements as required by this standard clause.

Pillar	Reference	Conforming
Traceability	9.1.2	Yes
Clause and Explanation		

Clause:

Proper identification shall be maintained for each lot, for each wild-caught and farm-raised source, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure product identity and demonstrate that products from wild-caught and aquaculture sources and those from certified and non-certified sources are not mixed.

Explanation:

Proper lot identification system was seen. Unit is presently Single star certification scope. Present identification ensures proper traceability of products. Tag enclosed from raw materials receiving to packing step.

Pillar	Reference	Conforming
Traceability	9.1.3	Yes
Clause and Explanation		

Clause:

For facilities that produce both wild-caught and farm-raised species, procedures shall ensure that wild-caught certified and farm-raised certified products were not compromised through mixing or substitution with non-certified wild caught product or non-certified farm-raised products, or through mixing of product of different BAP star categories.

Explanation:

Facility is handling Aquaculture shrimp material. Identification done through the Farm ID for Aquaculture. The identification and traceability is practising through the Pond ID for Aquaculture material Verified the traceability procedure.

Pillar	Reference	Conforming
Traceability	9.1.4	Yes
Clause and Explanation		

Clause:

The procedures and records shall clearly show controls and traceability at ALL steps: chain of custody evidence from the outsourced entity (country of origin, for example), on the way to the outsourced entity, during handling, production, labelling or storage at the outsourced entity, and during transport away from the outsourced entity back to the facility.

Explanation:

Appropriate lot identification system was seen Traceability procedure.Refer 9.1.1,9.1.2.

Pillar	Reference	Conforming
Traceability	9.2.1	Yes
Clause and Explanation		

Clause:

The facility shall develop, maintain and document appropriate traceability procedures and systems to include identification of batches of raw material, ingredients, in-process products, rework, outsourced processing, packaging, additives, and final product throughout the production process and any out-sourced product, ingredient or service.

Explanation:

Procedure is documented in SOP Manual, CCCIII/SOP/13.Coding system is designed based on EIA guidelines. Traceability systems were in place to enable complete traceability from finished product back to source of raw materials and packaging, and from raw materials forward to the customer. Traceability of product is possible through lot identification, and process control record. Company is doing traceability test once in year Documents and Records required for Traceability are listed and updated. Supportive Documents are Raw Material Receiving Register, Production Documents, Online monitoring documents, Soaking Register, and Packing Material Records, Cold Store Register & Shipment Details, Ingredient packing material inspection, issue records and test reports of In-house as well as external

laboratories. QC Manager is Designated as Team Leader to Carry-out Traceability Procedures. Traceability Procedure practiced also includes System Verification. Control of non-conformity procedure & handling requirements includes appropriate maintenance of Traceability.

Pillar	Reference	Conforming
Traceability	9.2.2	Yes
Clause and Explanation		

Clause:

The facility shall operate a traceability record-keeping process that provides timely, organized, accurate entries, performed and overseen by a designated trained person or traceability team responsible for collecting the data, ensuring it is complete and accurate, and that traceability requirements are met.

Explanation:

: Yes. The facility operated a traceability record-keeping process that provides timely, organized, accurate entries, performed and overseen by a designated trained person. Responsibility assigned to QA Manager. The Traceability information are maintained from raw material source, receipt at plant, processing, packaging and shipment. Identity of outsource products such as packaging material and ingredients traceability are maintained Refere Traceability Section A# 3.1 .

Pillar	Reference	Conforming
Traceability	9.2.3	Yes
Clause and Explanation		

Clause:

Where a facility's traceability system consists of paper records, separate documents, forms, notebooks and/or files, this information shall be transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data.

Explanation:

The Facility has maintains the updated traceability records in papers and transferred the data to a computer database to allow for transmission and verification of electronic data.

Pillar	Reference	Conforming
Traceability	9.2.4	Yes
Clause and Explanation		

Clause:

Where a facility's traceability system uses an online system or computer database, the facility shall keep copies of the documents or records that were used to transfer data to the electronic system in order to allow verification of the information in the electronic system.

Explanation:

Yes. Hard copies of traceability documents in spread sheet format are maintained. All forms, records backup flow record control procedure.

Pillar	Reference	Conforming
Traceability	9.3.1	N/A
Clause and Explanation		

Clause:

Wild-Caught Raw Material – The facility shall keep an up-to-date traceability records of all wild-caught raw material suppliers, including but not limited to:

- o Supplier name and address including country
- o Common or commercial name and species name
- o Date of deliveries and lot numbers
- o Input tonnage and total net weight produced for mass balance calculation
- o Quantity supplied by each supplier
- o Product form at time of landing
- o Date harvested (process date or date code)
- o Date landed
- o FAO statistical area of harvest
- o Country of first landing
- o Country of origin
- o Name of entity to which the fish was first landed or delivered including: name, telephone, and email address of contact person
- o Name of the flag of the harvesting vessel
- o Vessel(s) permit of license number
- o Unique vessel identifier (such as vessel name or registration number)
- o Specific type of fishing gear used for harvesting
- o Current GSSI recognized certificate (required for BSP logo use on packaging)

Explanation:

Not applicable. No wild Caught.

Pillar	Reference	Conforming
Traceability	9.3.2	Yes
Clause and Explanation		

Clause:

Farm-Raised Raw Material- Facilities shall maintain documented farm data for all farm deliveries received from all BAP certified and non-certified farm suppliers to include the below information, as applicable:

- o Farm supplier name
- o BAP farm certification number
- o Production method (pond, cages, reservoir, etc.)
- o Identification of production unit
- o Sources of post larvae/stocking material
- o Date of deliveries and lot numbers (one pond or culture unit on a single day)
- o Unit of measure and total net weight for mass balance
- o Movement document number (if relevant)
- o Feed use (type and lot numbers)
- o Reports of chemical treatments
- o Testing data for the presence of microbes, antibiotics and chemicals in product

Explanation:

Details explained under the BAP Annex 3/3.1

Pillar	Reference	Conforming
Traceability	9.3.3	Yes
Clause and Explanation		

Clause:

Ingredients/Packaging Materials - Facilities shall maintain complete data for all materials used in the product (including packaging, ingredients, chemical additives) from approved suppliers to include the below information, as applicable:

- o Supplier name and address
- o Facility invoice number and/or purchase order number
- o Receiving date, quantity and lot number
- o Full description of the item (ex: 3 mm poly film, sodium tripolyphosphate, batter, breading)
- o All label information including ingredients in, for example, the batter or breading where applicable
- o Lot number assigned by the facility when receiving in (if different from receiving lot number)
- o Storage location

Explanation:

Details explained under the BAP Annex 3/3.1

Pillar	Reference	Conforming
Traceability	9.3.4	Yes
Clause and Explanation		

Clause:

Finished Product - Facilities shall have a system in place that ensures up-to-date, and easily accessible, data of all wild-caught and farm-raised raw material suppliers. The facility shall maintain documented records and quantities for all finished product production lots to include the below information, as applicable:

- o Facility GAA certification number
- o Supplier name and address including country
- o Species of fish, both scientific name and common or commercial name
- o Product form at the time of landing including quantity and weight
- o Date harvested/production date (process date or date code)
- o FAO statistical area of harvest
- o Country of first landing
- o Country of origin
- o Date landed
- o Name of entity to which the fish was first landed or delivered including: name, telephone, and email address of contact person
- o Name of the flag of the harvesting vessel
- o Vessel permit or license number
- o Unique vessel identifier (such as vessel name or registration number)
- o Specific type of fishing gear used for harvesting
- o Date of deliveries and lot numbers
- o Input tonnage and total net weight produced for mass balance calculation
- o Evidence of chain of custody from harvest to export to USA, where applicable
- o Finished product forms (i.e. raw fresh, raw frozen, raw RTE, cooked, breaded, etc.)
- o Line number and/or shift, if applicable
- o Size grade

- o Accurate labelling: for the above and all other required information - ingredients, handling instructions, facility address or registration number where applicable, amount, source, and other full identification information for raw material used (shrimp, tilapia, etc., delivered from what supplier and when)
- o Amount and full identification information (see receiving) for any ingredients used (breeding, marinades, batter, spices, etc.) for each lot of production
- o Amount and full identification for any chemicals used (phosphates, sulphites) for each lot of product
- o Amount and full identification for all packaging used for each lot of production

Explanation:

Details explained under the BAP Annex 3/3.1

Pillar	Reference	Conforming
Traceability	9.4.1	Yes
Clause and Explanation		

Clause:

Products shall be packed in bags, boxes or master cartons, britestack pallets (i.e. canned) that are properly labeled with all information, including allergens, as required by local legislation and legislation of the country of destination.

Explanation:

Yes Plant is in compliance with this requirement with proper packing and labeling SOP including product information, handling, storage, product usage, nutrition information, product lot identification details, date of production and best before date etc.

Pillar	Reference	Conforming
Traceability	9.4.2	Yes
Clause and Explanation		

Clause:

Product labels shall also include all necessary information to ensure safe handling, storage, display, preparation and use of the product along the supply chain or by the consumer.

Explanation:

Product label is also mentioned about the customer 'intended use' where clearly mentioned about handling procedures after purchasing or in between different supply chain, Star status of the Product etc.

Pillar	Reference	Conforming
Traceability	9.5.1	Yes
Clause and Explanation		

Clause:

The facility shall keep an up-to-date list of all customer names and locations where they ship products to.

Explanation:

List of Customers verified. Major Export to USA

Pillar	Reference	Conforming
Traceability	9.5.2	Yes
Clause and Explanation		

Clause:

The facility shall maintain documented records for all production lots that records the below information, as applicable, for farm raised and for wild-caught species:

- o Lot number
- o Storage location
- o Shipping - company, method, date
- o Unique shipping identifiers - container or seal number, bill of landing
- o Receiving customer information - name, address, invoice or order number
- o Breakdown of all species, products, quantities, weight, sizes and lot numbers included in the shipment

Explanation:

Details explained under the BAP Annex 3/3.1

Pillar	Reference	Conforming
Traceability	9.6.1	Yes
Clause and Explanation		

Clause:

The facility shall demonstrate that the traceability system is effective and that product identity preservation has been maintained through conducting and documenting mass balance per 9.6.2, below.

Explanation:

Mass balance Exercise conducted by the facility and verified and found satisfactory.

Pillar	Reference	Conforming
Traceability	9.6.2	Yes
Clause and Explanation		

Clause:

The facility shall document the total quantity of incoming raw material for each species and the total quantity of finished product produced per species and product form. The facility shall conduct a mass balance on this data based on the expected percentage processing yield by species and product form. The quantities and mass balance results shall be provided to the auditor for verification.

Results from the mass balance calculations shall clearly show that the quantity of inputs versus the outputs for each test are appropriate. Calculations shall also reflect what the expected recovery/yield percentage for each final product form is and how they were derived. (Annex 1, Glossary, for definition of Mass Balance).

Explanation:

Refer 3.1. Mass balance also verified during the Sampling.

Trace 1 Mass Balance: Raw Material Qty - 3822 kg, Deheaded qty 2637 (69%), Peeled quantity 2611 kg (99%) soaked (only salt treatment - 8% salt of 3 hours- and soaked out quantity - estimated 2% pick up to get 2663 kg - 5% estimated cooking loss - to get 2530 kg, then peeled - 2176 (14% yield loss)

Trace 2 Mass Balance: Raw material - 7947 kg - headless 5563 (70%), peeling 4895 (87.95%) Soak out 5531 kg (12%), After cooking qty estimated 4867 (10% loss), frozen loss 1% - packed 1072 cartons 5x 2lb (4867 net weight) - overall yield 61.24%

Trace 3 : RM 8705, Deheaded 6111kg (70.2%); Peeled 5341 kg (87.3%); Soak - only salt 2% - Soak out 5448 (2%) and packed. Overall yield 56.93%.

Trace 4 RM 5938 kg, Deheaded 4038 kg (68%), Peeled qty 3529 (87.4%), Soak out - 3963 kg (12.3%), After cooking - 3468 kg - Overall yield 58.40%

Pillar	Reference	Conforming
Environmental	A2-1.1	N/A
Clause and Explanation		

Clause:

No Discharge into Natural Water Bodies: Facilities that do not discharge any effluents directly or indirectly into naturally occurring water bodies and comply with all other SPS requirements are eligible for GAA certification. (Examples: effluents used for irrigation or other purpose preventing discharge to naturally occurring water bodies. Where this is confirmed the requirements to sample and test effluents in Section 2 (below) do not apply.)

Explanation:

No Discharge into Natural Water Bodies: Plant does not discharge any effluent into naturally occurring water bodies or to any natural receiving waters or public drain canals. The entire treated effluent is used by the plant in their Agriculture land

Pillar	Reference	Conforming
Environmental	A2-1.2	N/A
Clause and Explanation		

Clause:

Discharge to Municipal or Private Treatment Plants: Facilities that have a valid contract with a municipality or industrial park facility that assumes the responsibility to treat and dispose of effluents in compliance with government, regional and local regulations are eligible for GAA certification if all other GAA requirements are met. (Where this is confirmed the requirements to sample and test effluents in Section 2 (below) do not apply.)

Explanation:

Not applicable: Refer A2-1.1

Pillar	Reference	Conforming
Environmental	A2-1.2.1	N/A

Clause and Explanation**Clause:**

Plants shall not exceed local or national government permitted load levels when discharging effluents to a municipal or industrial treatment facility.

Explanation:

Not applicable: Refer A2-1.1

Pillar	Reference	Conforming
Environmental	A2-1.3	N/A

Clause and Explanation**Clause:**

On-Site Treatment: Facility treats its own effluents and discharges under a valid government permit into a naturally occurring water body (sea, river, estuary, etc.) and all GAA effluent parameters are met as described in Section 2 (below).

Explanation:

Not applicable: Refer A2-1.1

Pillar	Reference	Conforming
Environmental	A2-2.1	N/A

Clause and Explanation**Clause:**

For New Applicants: At least three consecutive months of effluent data, collected during operation, must be available for effluents that enter natural bodies of water (rivers, streams, canals, estuaries, etc.). Effluent samples shall be analyzed for all the variables listed in the Table in Section 2 (including 3 months' worth for the quarterly variables).

Explanation:

NA. This is recertification audit

Pillar	Reference	Conforming
Environmental	A2-2.2	N/A

Clause and Explanation**Clause:**

For Recertification: Test results ongoing as noted in the table below.

Explanation:

Not applicable. Plant does not discharge any

effluent into naturally occurring water bodies or to any natural receiving waters or public drain canals. The entire treated effluent is used by the plant in their Agriculture land

Pillar	Reference	Conforming
Environmental	A2-2.3	N/A
Clause and Explanation		

Clause:

To minimize the chance of disease transmission from effluents discharged to natural waters, plants shall screen out solids and treat effluents by chlorination or another method of disinfection which will kill the disease organisms before release. (Once the effluents are properly treated, disinfectant residues shall be neutralized, removed, or allowed to dissipate prior to effluent discharge).

Explanation:

Not applicable. Plant does not discharge any effluent into naturally occurring water bodies or to any natural receiving waters or public drain canals. The entire treated effluent is used by the plant in their Agriculture land

Pillar	Reference	Conforming
Environmental	A2-2.4	N/A
Clause and Explanation		

Clause:

Records of effluent water quality concentrations entering natural bodies of water shall comply with government regulations, or the SPS criteria (See Table below), whichever is stricter.

Explanation:

Not applicable. Plant does not discharge any effluent into naturally occurring water bodies or to any natural receiving waters or public drain canals. The entire treated effluent is used by the plant in their Agriculture land

Pillar	Reference	Conforming
Environmental	A2-2.4.1	N/A
Clause and Explanation		

Clause:

* Mixing Zone Option for marine environments only:

Facilities that are unable to comply with the variable limits listed in Annex 2 Table 1, may elect an alternative approach to compliance by demonstrating that the water quality (as measured by the same set of variables) at the edge of the mixing zone (samples taken within a few meters downstream of the discharge pipe – closer or farther depending on the energy level of the receiving environment) and outside the mixing zone (samples taken upstream from the discharge pipe) does not differ. Sampling must be done on a quarterly basis.

For facilities that are unable to comply with the variable limits listed in Annex 2 Table 1, an assimilative capacity study on

the receiving waters by a qualified third-party, updated annually, would be an acceptable alternative to demonstrate compliance. The results of the assimilative capacity study shall show that there are no adverse effects on the receiving water bodies from the release of facility effluents.

Explanation:

No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Environmental	A2-2.5	N/A
Clause and Explanation		

Clause:

Facilities must record and submit the average annual concentrations for each variable for effluents that entered natural bodies ("receiving waters") of water from your facility during the last calendar year. This will include:

Explanation:

No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Environmental	A2-2.5.0A	N/A
Clause and Explanation		

Clause:

Please input the annual average value of pH (standard units)

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0B	N/A
Clause and Explanation		

Clause:

Please input the annual average value of Total suspended solids in mg/L

Explanation:

0

Pillar	Reference	Conforming
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Environmental	A2-2.5.0C	N/A
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Clause and Explanation

Clause:

Please input the annual average value of Total phosphorus in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0D	N/A

Clause and Explanation

Clause:

Please input the annual average value of Soluble phosphorus in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0E	N/A

Clause and Explanation

Clause:

Please input the annual average value of Total ammonia nitrogen in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0F	N/A

Clause and Explanation

Clause:

Please input the annual average value of 5-day biochemical oxygen demand in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0G	N/A
Clause and Explanation		

Clause:

Please input the annual average value of annual Oil and grease content in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.0H	N/A
Clause and Explanation		

Clause:

Please input the annual average value of Dissolved Oxygen in mg/L

Explanation:

0

Pillar	Reference	Conforming
Environmental	A2-2.5.1	Yes
Clause and Explanation		

Clause:

The facility must record and provide to the auditor the annual average volume of effluent discharge in cubic meters/day. The auditor shall report this data to GAA for informational purposes only.

Explanation:

320

Pillar	Reference	Conforming
Environmental	A2-2.5.1.A	N/A
Clause and Explanation		

Clause:

Please input annual average volume of effluent discharged in cubic meters/day for last calendar year.

Explanation:
320

Pillar	Reference	Conforming
Environmental	A2-2.5.1.B	N/A
Clause and Explanation		

Clause:
Please input the number of days the plant was in operation during the last calendar year.

Explanation:
365

Pillar	Reference	Conforming
Environmental	A2-2.6	N/A
Clause and Explanation		

Clause:
Collection of Effluent Samples during the Audit and Third-Party Laboratory Testing Instructions to Facilities and Auditors:
o The auditor shall supervise the collection of representative effluent samples during every GSA audit where Section 2 applies.
o Samples shall be taken by the facility, or the facility's designated third-party lab. The auditor is to supervise this process and verify that samples are taken from the correct locations and using accepted sample collection methods. Sampling may only be conducted during periods when processing and cleaning is occurring.
o Once the samples are collected, the auditor is to verify that they were properly marked with the sample number, date, time, facility name, sample location, and collection method (either grab or composite). Auditors must also ensure that the samples are sealed with tamper-proof tape and sent to, or picked up by, the third-party testing laboratory prior to completion of each audit.
o This obviously means that addressing effluent sampling shall not wait until the end of the audit. Nor be done after hours or on weekends when third-party labs are closed.
o Samples are to be tested for all parameters as described in Section 2. It is the facility's responsibility to ensure the third-party laboratory doing the testing is aware of and able to perform GSA required tests.
o Testing costs are the responsibility of the facility. Test results are to be forwarded for review, in a timely fashion, to the Certification Body responsible for conducting the audit.
o The third-party lab is to obtain the Certification Body's contact information and email address for directly forwarding the test results to them in a timely fashion.
The facility shall give permission for this to the third-party lab.

Explanation:
No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Environmental	A2-2.6.1	N/A

Clause and Explanation**Clause:**

Where Annex 2 applies - were samples collected properly by the facility or third-party lab, from the correct locations and using accepted sample collection methods, marked and sealed properly and sent to or picked up by the third-party lab during the audit? (Auditor to note in comments who collected the sample)

Explanation:

No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Environmental	A2-2.6.2	N/A

Clause and Explanation**Clause:**

Where Section 2 applies - the auditor shall describe the correct sample label details here for each sample: date, time, sampling location, and sample number.

Explanation:

No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Environmental	A2-2.6.3	N/A

Clause and Explanation**Clause:**

The auditor shall also record how the sample was packaged, and the name of the third-party lab that picked it up, and where the sample was shipped. The auditor shall verify and record that samples were shipped immediately by the facility, the shipping method, and the name of the laboratory to which they were sent. (Informational purposes only).

Explanation:

No Discharge into Natural Water Bodies:

Pillar	Reference	Conforming
Traceability	A3-1.1	Yes

Clause and Explanation**Clause:**

The facility shall have a documented label control procedure to ensure integrity of BAP star category claims. The procedure shall include personnel authorized to approve, amend and release labels and its specifications and work instructions to control label use and their storage. The procedure shall also include the prevention of mislabelling of products of different BAP star categories for all applicable species.

Explanation:

Product traceability procedure (CCCIII/SOP/13) developed and available for reference. It includes all the requirements as required by this standard clause.

Pillar	Reference	Conforming
Traceability	A3-1.2	Yes
Clause and Explanation		

Clause:

The label control procedure shall include a procedure for the proper labelling and downgrading of the star status of products in the event the facility mixes product of different BAP star categories. Where this occurs, records shall be maintained demonstrating which products of different BAP star categories were mixed, and that the star status of resultant product was properly downgraded. Examples:

- If 3-star BAP products are mixed with 2-star BAP products, then the entire product lot must be labelled as 2-star BAP product. The 3-star BAP products will lose its 3-star status.

Explanation:

Procedure includes proper labelling and downgrading of the star status of products in the event the facility mixes product of different BAP star categories

Pillar	Reference	Conforming
Traceability	A3-1.3	Yes
Clause and Explanation		

Clause:

The facility shall properly identify and label products of different BAP star categories whether or not BAP logo is used on packaging. Proper identification shall be maintained for each lot, for each star category, on all documents and at each step of the process flow from raw material receiving, handling, processing, packaging, storage and dispatch. Records shall be maintained to ensure integrity of BAP product claims and also demonstrate product of different BAP star categories are not mixed.

Explanation:

BAP Labelling & Packing Procedure is documented on BAP Label Control Policy (CCCIII/SOP/13-A)

QA Manager is the authorized person for an approval of label, amend and release labels and its specifications and work instructions to control label use and their storage.

Management Representative issues a Circular For Information on the day of production to all relevant people in the personnel like production staff, storage staff and QA staff to inform about the product and source of the raw material etc. All the records, labels through out the process were labeled with farmer traceability code, Star status and production date on every label through out the process. Same is observed as part of traceability exercise conducted during audit.

Pillar	Reference	Conforming
Traceability	A3-2.1	No - Minor

Clause and Explanation**Clause:**

The facility shall assign a unique code or lot number separately for products of each BAP star category. This unique code or lot number shall be assigned at receiving and carry forward through each step of production, packaging and storage in order to easily identify and trace every lot of BAP 1, 2, 3 and 4-star products from each other, and from non-BAP products.

Explanation:

All the products processed in the facility is identified with traceability code including the day of processing and farm details as per the legal requirement. The products were labelled with farmer details through out the process evident during audit. Procedure for Traceability system addressing the requirement.

Minor NC

During Site visit, it was observed that the facility was assigning a supplier code to raw materials. However, there was no application of a unique code at receiving and carry forward through each step of production, packaging and storage in order to easily identify and trace every lot of BAP 1, 2, 3 and 4-star products from each other, and from non-BAP products. Though in the final product packed, it was marked as "4S" to identify that it was a four star product.

Pillar	Reference	Conforming
Traceability	A3-2.2	No - Minor

Clause and Explanation**Clause:**

Product shall not be claimed as BAP 2, 3 or 4-star unless the unique code or lot number stated in A3-2.1 appears on all production documents from receiving throughout to shipping. Or, where product is assigned a different code or number at some stage, the unique code or lot number referenced in A3-2.1 shall also be referenced in the production document(s) together with the new code. These documents shall also bear the BAP certification number of the farm(s), hatchery/nursery and/or feed mill the product was sourced from, and the quantity per lot for each BAP star category.

Explanation:

Minor NC

The facility was processing four-star raw material during audit. However, the BAP farm, Hatchery and Feed mill identification was not evident in the raw material receiving documents and the unique code identifying star status was also not evident in the production documentation.

Though, the star status is traceable through supplier declaration.

Pillar	Reference	Conforming
Traceability	A3-2.3	Yes

Clause and Explanation**Clause:**

Finished product codes and/or lot numbers that appear on the master carton and inner packaging shall either match the unique codes referenced in A3-2.1, or, there shall be a reference back to those unique codes in finished product documents so that the packaging codes and the unique codes in A3-2.1 are tied to each other.

Explanation:

Four Star Product from Cold Room - Traceability Code AP048664-5/006 Supplier code SK5P6 and Production code 23G197 can be tracked to Farm, Hatchery, Feed Mill.

However, Refer to A3-2.2

Pillar	Reference	Conforming
Traceability	A3-2.4	Yes
Clause and Explanation		

Clause:

The codes and lot numbers referenced in A3-2.1 to A3-2.2 shall also be transferred to shipping documents that are provided directly to the purchaser/buyer. The facility shall provide to the auditor the document being used for this purpose and the auditor shall record this information on the audit report.

Explanation:

Traceability verified in the Docs. Verified the shipping docs during traceability study.

Pillar	Reference	Conforming
Traceability	A3-2.5	Yes
Clause and Explanation		

Clause:

For each shipment, the documents referenced in A3-2.4 shall also record the breakdown of quantities for each BAP star category and its unique code or lot number.

Explanation:

Product Release Record include all the details of production date and Codes of each Batch. Verified during traceability exercise

Pillar	Reference	Conforming
Traceability	A3-2.6	No - Minor
Clause and Explanation		

Clause:

The facility must record and provide to the auditor evidence of a documented relationship with all BAP facilities to which the facility is linked for purposes of star status claims, including the names of all supplying facilities, names of all receiving facilities, and the corresponding annual volume of BAP product exchanged between the named BAP facilities in metric tons/year.

Explanation:

Only Aquacultured material in the Scope.

The facility has contract with BAPCertified Farms.

Minor NC

While verifying linkages of farms during the 4-traceability exercise it was evident that the material came from BAP certified farms-

BAP ID F11823; P F11828; F12431B and F12431c.

However, the linkage of these farms was not evident in the BAP website.

Though, it is verified that the raw materials were sourced and received after the issue dates of respective BAP Farm certificates

Pillar	Reference	Conforming
Traceability	A3-2.7	Yes
Clause and Explanation		

Clause:

Where the facility is eligible to produce BAP 2-star product(s), the facility shall keep an up-to-date list of all of the BAP-certified farms that are supplying them since the last BAP audit. This information shall also include the quantity by species actually supplied by each farm, the productive capacity of each farm, and the BAP facility certification number for each farm.

Explanation:

Upto date list of all farms was available with site.
However, refer to A3-2.6

Pillar	Reference	Conforming
Traceability	A3-2.8	Yes
Clause and Explanation		

Clause:

Where the facility is eligible to produce BAP 3 and/or 4-star, the facility shall keep an up-to-date list of the BAP certified farms that are supplying them since the last BAP audit.

Explanation:

Refer A3 2.6. List of BAP Certified farms available.

Pillar	Reference	Conforming
Traceability	A3-2.9	Yes
Clause and Explanation		

Clause:

In addition, facilities producing 3-star product shall require supplying farms to provide documentation verifying of their BAP 3-star eligible lots. Likewise, facilities producing 4-star product shall require supplying farms to provide documentation verifying of their BAP 4-star eligible lots.

Explanation:

Verified during Traceability Exercise. Refer A3 2.6

Pillar	Reference	Conforming
Traceability	A3-2.10	Yes
Clause and Explanation		

Clause:

The facility shall also conduct mass balance tests on a per lot basis for each star category per species and product form. Per lot mass balance verification data shall be provided to the auditor for verification.

Explanation:

Mass balance test also carried out by the facility for each star category by Facility and was also cross checked during traceability exercises during audit.

Pillar	Reference	Conforming
Traceability	A3-2.11	Yes
Clause and Explanation		

Clause:

Results from A3 2.10 and 9.6.2 shall clearly show that the quantity of inputs versus the outputs for each test are appropriate, and that no mixing of BAP-certified products with non-certified products and no mixing of wild-caught with BAP eligible species occurred. (If the facility mixes product of different BAP star categories together in a lot, this situation shall be handled as described under A3 1.2). Calculations shall also reflect what the expected recovery/yield percentage for each final product form is and how they were derived. (See Appendix 1, Glossary, for definition of Mass Balance).

Explanation:

Input out put Reconciliation done.

Results from A3 2.10 and 9.6.2 clearly show that the quantity of inputs versus the outputs for each test are appropriate, and that no mixing of BAP-certified products with non-certified products.

Also refer A3-3.3 (Mass balance)

No wild caught species processed

Pillar	Reference	Conforming
Traceability	A3-2.12	Yes
Clause and Explanation		

Clause:

The facility shall provide the auditor a summary of the quantities for each BAP-certified species, broken down into their respective Star Status categories and this data shall be included in the audit report.

Explanation:

Site provided a summary of the quantities for each BAP-certified species, broken down into their respective Star Status categories. Details as follows.

2022 Production Data

Vannamei Shrimp- only 4 star products were produced

Raw Frozen -Finished products 13.72 MT Raw material quantity - 19.6 MT, Yiled 70.0%

Frozen cooked shrimp - Finished product 24.1 MT Raw Material quantity - 40.1 MT Yield 60.0%

P. monodon
No production in 2022

Total Production in 2022
Finished product 37.8 MT

Pillar	Reference	Conforming
Traceability	A3-3.1	Yes

Clause and Explanation

Clause:

The results of the trace-forward and trace back exercises shall be recorded for each star category the facility is authorized to produce. 100% accountability shall be achieved during the exercises.

Explanation:

Trace 1: Four star - Frozen Cooked in Shell Deveined Tail on shrimps IQF - Batch code 3F24 (24- June 2023) - 400 cartons 16x12Oz in a Master Carton. (2173kg). Invoice no. TCAM/044/23/24 dated 24-07-2023 - Choice Canning Inc. Destination New Jersey USA. Container No. MNBU3699451 BL 229352338 onboard date 26-07-2023. Vishakapatnam.

Farm ID AP010891-1/045 - Chakravarthi and Partners - (BAP ID F11823)- Certificate and agreement:, Hatchery - H10327 GeeKay Hatchery, M10040 AVANTI FEEDS LIMITED (1&3)- Details from Shrimp Harvest Report - SOP/QC/35 and Supplier decalration FMT/QC/01 Farm Audit CCCIII/REC/87 dated 03-06-2023.

Salt Batch - 0422 Nirma - qty used 209. overall yield - 56.9%

Pouch - Batch 250223 (Printed) - Jiya Packaging. Mastor Carton - Exo Pack.

Trace 2 - Four Star - Frozen Cooked Peeled deveined tail-on shrimp IQF - Batch Code 3H07 (07 Aug 2023)- 1072 cartons 5x 2lb (4867 net weight)- Invoice no. TCAM/069/23-24 dated 18.08.2023. Container TTNU8123273 BL MEDUZW358200 Onboard date 24 Aug 2023. Vishakapatnam - Destination New Jersey

Farm ID - AP044378-1/012 Farmer - Per [REDACTED] (BAP F11828) ; H10327 GeeKay Hatchery; M10040 AVANTI FEEDS LIMITED (1&3)

Pouch Batch no. CCC-113 Pragathi Print Pack, Cartons - PPP939 - Coramandel.

Chemicals - STPP - R& B foods - Batch 230323015 - 100.8 kg -% and Salt - 0123 Nirma - 2% (100.8kg) - 3 hours soaking Soaking record FMT/QC/07

Trace 3: Product Frozen Frozen Raw peeled undeveined tail on Shrimp IQF 3G27 (27 July 2023), - 1200 cartons - 5x 2lb 5448 kg, Invoice no. TCAM/064/23-24 dated 11 Aug 2023. Container no. MNBU0616622 BL no. 230080943. onboard date 16 Aug 2023. Vizak - New Jersey.

Farm ID AP049061-2/061. - Farmer Sat [REDACTED] (F12431B) ; H10247 Varun Hatcheries; M10040 AVANTI FEEDS LIMITED (1&3)

Trace 4: Three star Frozen Cooked peeled deveined tail on shrimps - Batch Code 3J05 - 05 Sept 2023 - 850 cartons - 12x12 oz - (3468 kg)

Invoice TCAM/095/23-24 dated 13-09-2023 Container HLBU 9501409 BL SAMSKPM62423 onboard 23.09.2023. Vishakapanam - New Jersey.

Farm ID AP048664-3/002 - Farmer Lav [REDACTED] - BAP F12431c, H10327 GeeKay Hatchery, M10040 AVANTI FEEDS LIMITED (1&3)

Packaging - Pouch - Pragathi-PPP5812 , carton coramandel cartons CCC0116

Chemicals - only salt Batch 0123 - Nirma - 2% salt - 69 kg. STPP - Batch 230323015 3% - 110.58 kg 3 hrs.

Pillar	Reference	Conforming
Traceability	A3-3.2	Yes

Clause and Explanation

Clause:

Once the lots are selected by the auditor for tracing, the results for all of them combined shall be achieved in no more than one half-day (4 hours).

Explanation:

Total time for traceability was 2 hrs 30 mnts.

Pillar	Reference	Conforming
Traceability	A3-3.3	Yes

Clause and Explanation**Clause:**

Mass balance shall also be recorded for each exercise. The auditor shall also record what percentage of product the facility produced during the previous calendar year for each star category so as to verify the selection of lots and the number of exercises were appropriate as described in the above table instructions. Final results for all exercises shall be in line with expectations.

Explanation:

Refer 3.1. Mass balance also verified during the Sampling.

Trace 1 Mass Balance: Raw Material Qty - 3822 kg, Deheaded qty 2637 (69%), Peeled quantity 2611 kg (99%) soaked (only salt treatment - 8% salt of 3 hours- and soaked out quantity - estimated 2% pick up to get 2663 kg - 5% estimated cooking loss - to get 2530 kg, then peeled - 2176 (14% yield loss)

Trace 2 Mass Balance: Raw material - 7947 kg - headless 5563 (70%), peeling 4895 (87.95%) Soak out 5531 kg (12%), After cooking qty estimated 4867 (10% loss), frozen loss 1% - packed 1072 cartons 5x 2lb (4867 net weight) - overall yield 61.24%

Trace 3 : RM 8705, Deheaded 6111kg (70.2%); Peeled 5341 kg (87.3%); Soak - only salt 2% - Soak out 5448 (2%) and packed. Overall yield 56.93%.

Trace 4 RM 5938 kg, Deheaded 4038 kg (68%), Peeled qty 3529 (87.4%), Soak out - 3963 kg (12.3%), After cooking - 3468 kg - Overall yield 58.40%

Pillar	Reference	Conforming
Food Safety	A4-1.1	N/A

Clause and Explanation**Clause:**

Auditors shall provide a narrative description of the process used to select samples, and any difficulties encountered in assembling the requisite number of samples.

Explanation:

Product Sampling done by BAP Auditor and handed over to sampler for third party accredited lab

ITC Analytical Services, NABL TC-5459. Sampler no, Mr. D. Ch [REDACTED] Sampling done on day 2 (05 Oct 2023) between 11.00 AM -12.00 pm) as it was unannounced audit and sampler was not immediately available. 4 samples of Vannamee shrimp including (3 cooked and 1 raw sample) and 4 samples of P. monodon (Aquacultured) - all cooked. Total eight samples.

Photos of sampling were taken and available.

Pillar	Reference	Conforming
Food Safety	A4-1.2	N/A

Clause and Explanation

Clause:

Auditors must supply documentation associated with the samples collected, to include: · A copy of the plant inventory sheet in use on the day samples are collected, against which the selection of samples was made (supply as an Excel or Word file, or as a legible scanned file or photo)

*List of samples collected, facility and laboratory details (as an Excel file), detailing the following:

*Facility name and GSA ID number

*Third-party laboratory name and contact details

*Sampling date and times

*Species (scientific name)

*Primary Product Form description (per sample)

*Alphanumeric Sample Code assigned by auditor - as written on sample bags (per sample)

*Production lot ID or date code (per sample)

*Description of product, including product specifications such as size or count, supplier code, etc. (per sample)

*Photos of each sample collected, showing the assigned alphanumeric code and any other tracking information visible on the bag (per sample)

*A description of how the samples were packed and shipped shall be provided to GSA.

Once testing has been completed, the laboratory must forward an original copy of the analytical results directly to the CB and GSA, with a copy to the facility. Results must be documented in the certification records, and CB's must supply GSA with copies of the test results.

If any positive results are detected in a composited sample, laboratories will be required to utilize the retained portions of individual samples to

determine which production lot(s) were the cause of the positive results. Facilities shall launch an investigation into the root cause of such contamination,

and document effective corrective actions to prevent future recurrences. Positive test results will normally result in GSA assigning a more frequent level of

"Plant Ongoing Monitoring", as is subsequently described in Section 3 of Annex 4.

Explanation:

Product Sampling done by BAP Auditor and handed over to sampler for thrid party accredited lab

ITC Analytical Sevices, NABL TC-5459. Sampler no, Mr. D. Ch [REDACTED]

4 samples of Vanname shrimp including (3 cooked and 1 raw sample) and 4 samples of P. monodon (Aquacultured) - all cooked. Total eight samples.

Photos of sampling were taken and available.

Litopenaues vannamei

Raw

V1- 3H17, AP044375-2/032, REZPL, 21/25, 10X2LB

Cooked 5X2LB

V2- 3J08, AP048655-2/007, CIST, 16/20

V3- 3J22, AP048656-3/005, CPTO, 31/40

V4- 3J21, AP048663-6/022, CIST, 21/25

P. monodon all cooked

P1, P2, P3 and P4 from single code 3J12, APO48662-1/009, CIST BT, 5x 2 lbs

Pillar	Reference	Conforming
Food Safety	A4-1.4	Yes

Clause and Explanation

Clause:

The auditor shall confirm whether the tests carried out by the Third-party Laboratory were complete, that the correct parameters were tested, using testing methods acceptable to GSA, and using the correct levels of sensitivity (LOQ's, MRPL's), as specified in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Tests are complete and Accurate with proper LOQs and MRPLs.

All reports dated 15-10-2023

Antibiotics

L. Vannamei

TC54592300006879F -(ITC/23-24/AQ2300070561_Pt/2A, ITC/23-24/AQ2300070562_PI /2A, ITC/23-24/AQ2300070563_PI /2A, ITC/23-24/AQ2300070564_PI /2A)

P. Monodon

Test Reports dated 15-10-2023

TCS4592300006883F- (ITC/23-24/AQ2300070565 P I/2A; ITC/23-24/ AQ2300070566 PI/2A; ITC/23-24/ AQ2300070567 PI/2A; ITC/23-24/ AQ2300070568 PI/2A)

Microbiology

L. vannamei

TC54592300006658F, TC54592300006659F; TC54592300006660F; TC54592300006661F

P. monodon

TC54592300006662F;TC54592300006663F; TC54592300006664F; TC54592300006665F

Pillar	Reference	Conforming
Food Safety	A4-1.5	Yes
Clause and Explanation		

Clause:

The auditor shall confirm whether the results from the tests on samples collected during the audit conform to the GAA limits stated in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Refer A4 1.4. The Test results on samples collected during the audit conform to the GAA limits stated in Annex 4 Tables II, III

Pillar	Reference	Conforming
Food Safety	A4-2.1	N/A
Clause and Explanation		

Clause:

The auditor shall record the name and contact details for the Third-party Laboratory or Sampling company, and the name of the staff member that collected the samples.

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No thrd party sampling has been invoked

Pillar	Reference	Conforming
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Food Safety	A4-2.2	N/A
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Clause and Explanation

Clause:

The auditor shall confirm whether the tests carried out by the Third-party Laboratory were complete, that the correct parameters were tested, using testing methods acceptable to GSA, and using the correct levels of sensitivity (LOQ's, MRPL's), as specified in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No thrd party sampling has been invoked

Pillar	Reference	Conforming
Food Safety	A4-2.3	N/A

Clause and Explanation

Clause:

The auditor shall confirm whether the results from the tests on samples collected during the audit conform to the GAA limits stated in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No thrd party sampling has been invoked

Pillar	Reference	Conforming
Food Safety	A4-3.1	Yes

Clause and Explanation

Clause:

What is the frequency of "Plant Ongoing Monitoring" the facility is using at the time of the audit? Does the frequency of such testing conform to what is expected for the facility under the requirements of Annex 4 Table I?

Explanation:

Plant Ongoing Monitoring" the facility is using at the time of the audit is once in six months . No alerts

Pillar	Reference	Conforming
Food Safety	A4-3.2	Yes

Clause and Explanation

Clause:

The auditor shall confirm whether the tests carried out by the Third-party Laboratory were complete, that the correct parameters were tested, using testing methods acceptable to GSA, and using the correct levels of sensitivity (LOQ's, MRPL's), as specified in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Verified the reports and Found conforming the Frequency and results. Used Correct levels of LOQs and MRPLs. No alerts

Pillar	Reference	Conforming
Food Safety	A4-3.3	Yes
Clause and Explanation		

Clause:

The auditor shall confirm whether the results from the tests on samples collected during the audit conform to the GAA limits stated in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Test results found conform with the BAP SPS 5.1 Annex 4. Refer: 4.5.2

Pillar	Reference	Conforming
Food Safety	A4-3.4	Yes
Clause and Explanation		

Clause:

Were the results of "Plant Ongoing Monitoring" communicated to the CB and to the GAA as required?

Explanation:

Facility has communicated results and the reports verified during audit.

Pillar	Reference	Conforming
Food Safety	A4-3.5	N/A
Clause and Explanation		

Clause:

What is the frequency of "Plant Ongoing Monitoring" the facility is using at the time of the audit? Does the frequency of such testing conform to what is expected for the facility under the requirements of Annex 4 Table I?

Explanation:

Plant Ongoing Monitoring" the facility is using at the time of the audit is once in six months.

There is no detections of Refer A4 3.1- no detections, No alerts, no public notification since last audit till date. No accelerated sampling

Pillar	Reference	Conforming
Food Safety	A4-3.6	N/A
Clause and Explanation		

Clause:

Did the Facility arrange for a Third-party Laboratory accredited to ISO 17025 or equivalent, or a Sampling Company recognized by GAA to collect samples as required?

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No accelerated sampling

Pillar	Reference	Conforming
Food Safety	A4-3.7	N/A
Clause and Explanation		

Clause:

The auditor shall confirm whether the tests carried out by the Third-party Laboratory were complete, that the correct parameters were tested, using testing methods acceptable to GSA, and using the correct levels of sensitivity (LOQ's, MRPL's), as specified in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No accelerated sampling

Pillar	Reference	Conforming
Food Safety	A4-3.8	N/A
Clause and Explanation		

Clause:

The auditor shall confirm whether the results from the tests on samples collected during the audit conform to the GAA limits stated in Annex 4 Tables II, III, or IV, as applicable.

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No accelerated sampling

Pillar	Reference	Conforming
Food Safety	A4-3.9	N/A
Clause and Explanation		

Clause:

Were the results of "Plant Ongoing Monitoring" communicated to the CB and to the GAA as required?

Explanation:

Refer A4 3.5- no detections, No alerts, no public notification since last audit till date. No accelerated sampling