

Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	Choice Canning Company (Division of Choice Trading Corporation Private Ltd)	Site code	10007235
Site name	CHOICE CANNING COMPANY UNIT III (A division of Choice Trading corporation Private Limited)		
Scope of audit	Processing (beheading, peeling, deveining, grading, soaking, tray-setting, glazing, freezing) and packing of raw / raw marinated shrimps and cooked shrimps (aquaculture) as individually quick-frozen in Polyester laminated LDPE bags and in ring form with cocktail sauce in HIPS trays with PET lids and finally into corrugated paperboard master cartons.		
Exclusions from scope	None		
Justification for exclusion	None		
Audit start date	2023-11-02	Audit finish date	2023-11-03
Re-audit due date	2024-11-07	Head office	No

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

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit programme	Announced
Previous audit grade	A		Previous audit date	2022-11-07	
Certificate issue date	2023-12-12		Certificate expiry date	2024-12-19	
Number of non-conformities			Fundamental	0	
			Critical	0	
			Major	0	
			Minor	7	

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3. Company Details			
Site address	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, 533577, India		
Country	India	Site telephone number	+91 8086769744
Commercial representative name	Mr. Sre [REDACTED]	Email	Sre [REDACTED]@choicegroup.in
Technical representative name	Mr. Sre [REDACTED]	Email	Sre [REDACTED]@choicegroup.in

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift pattern	3 shifts (0600 to 1400; 1400 to 22000 & 2200 to 0600)				
Seasonal site	No				
Seasonal opening times (Start/end date)	Click or tap to enter a date.		Click or tap to enter a date.		
Other certificates held	BAP SPS 5.1				
Outsourced processes	No				
Outsourced process description	Not Applicable				
Regions exported to	Asia North America Choose a region				
Company registration number	EIA Approval Number 1954				
Major changes since last BRCGS audit	BRCGS Issue Change from 8 to 9				
Company Description					

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4. 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.

Notably - 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.

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. This year raw marinated shrimp and also shrimp rings with cocktail sauce also has been added to the portfolio.

No. of employees – 350 Nos. Size of the unit-4550 Sq. M. Production Capacity- 56 MT/ day.

Facility operates throughout the year. No seasonality.

This is re-certification audit conducted onsite (announced).
 Audit Conducted within Window Period
 Single Site. No separate head office audit.
 All functions related to food safety and quality are managed from this site.

5. Product Characteristics

Product categories		04 - Raw fish products & preparations 08 - Cooked meat/fish products Category			
Finished product safety rationale		For cooked product- product is cooked to attained required product core temperature to achieve 6-D reduction of L. monocytogenes. Further- method of preservation is freezing to attain product core temperature -18 Deg C. Storage requirement of product is at or below -18 Deg C. Long shelf life in frozen. For Raw product- - method of preservation is freezing to attain product core temperature -18 Deg C. Storage requirement of product is at or below -18 Deg C. Long shelf life in frozen. Low risk as products are intended to to be cooked before human consumption.			
High care	No	High risk	Yes	Ambient high care	No
Justification for area		High Risk area – Handling of product which has been cooked to to achieve 6-D reduction of L. monocytogenes			

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5. Product Characteristics	
	Low risk area- for handling raw materials, in-process product prior to cooking and also raw product meant to be cooked before consumption.
Allergens handled on site	Crustaceans Choose an allergen
Product claims made e.g. IP, organic	BAP Star
Product recalls in last 12 months	No
Products in production at the time of the audit	Frozen Cooked Vannamei Cooked peeled tail on CPTO

6. Audit Duration Details			
Total audit duration	26 man hours	Duration of production facility inspection	13 man hours
Reasons for deviation from typical or expected audit duration	Audit done for 26 hours as due diligence due to new products in scope. No time extension required for next audit.		
Combined audits	None		
Next audit type selected	Unannounced – mandatory 1 in 3 years		

Present at audit					
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)					
Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
Mr. Gaurav Rathore	Chief Operating Officer	onsite		onsite	onsite
Mr. Sreejith KM	Sr. Manager QA	onsite	onsite	onsite	onsite
Mr. Joshua Farinella	General Manager	onsite		onsite	onsite
Mr. Abhilash Karunakaran	Manager QA	onsite	onsite	onsite	onsite
Mr. J. Ravi Kumar	Plant Engineer	onsite	onsite	onsite	onsite
Mr. P. Kiran Kumar	HR Officer	onsite		onsite	onsite

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Mr. Me [REDACTED]	Sr. Manager HR	onsite		onsite	onsite
Mr. Nav [REDACTED]	Manager – Packaging Development	onsite	onsite	onsite	onsite

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2022-11-07	BRCGS	Announced	Pass
2022-11-10	BAP SPS	Announced	Pass
2023-10-04	BAP SPS	Unannounced	Pass

Document control			
CB Report number	IN/F/B/964138		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	Template issue date	2022-12-16
Directory allocation	Food	Version	1.1

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Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements

Clause	Detail	Critical or Major	Re-audit date

Critical

Clause	Detail	Re-audit date

Major

Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by



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Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.2	Surveys related to food safety culture have been done in the month of Oct 2023. However, the Food Safety Survey questionnaire is in English and not available in local language for better understanding and participation.	<ul style="list-style-type: none"> - Food safety survey questionnaire is prepared in local and Hindi language for better understanding and participation. - Training conducted to Concerned team member. 	<ul style="list-style-type: none"> - Periodical training to existing and new staff on the Food safety Survey questionnaire. -Measuring the performance of the activities of food safety survey among the staffs during internal audit. - Review the effectiveness of the food safety survey annually. 	<ul style="list-style-type: none"> - The Food Safety survey questionnaire was not prepared in local languages due to lack of awareness. 	2023-11-25	Ja [Redacted]
1.1.3	Objectives are monitored on a quarterly basis and reported to management on a quarterly basis. Doc ref: CCCIII/REC/78. Results of the objectives monitoring are communicated to the key staff through HACCP monthly meetings. However, there is no system to communicate results to all staff at least on a quarterly basis.	<ul style="list-style-type: none"> - Quarterly staff meeting initiated to communicate system to all staff regarding the objectives and the monitoring results. - Training on the food safety objectives initiated to all staff and workers. 	<ul style="list-style-type: none"> - Effectiveness of the training are assessed quarterly. - Training conducted for the concerned Team. - Communication of objective monitoring to all staff will be included in the internal audit. 	<ul style="list-style-type: none"> - Food safety team overlooked to communicate all staff regarding the objectives and monitoring results. 	2023-11-25	Ja [Redacted]
4.4.1	Partitions walls in Utensil washing room of pre-processing section observed with exposed PUF	<ul style="list-style-type: none"> - Partitions walls in utensils washing room of pre-processing section exposed puff was beaded. 	<ul style="list-style-type: none"> - Exposed puff beading is added into the monthly fabrication and hygiene checklist. 	<ul style="list-style-type: none"> Exposed puff in utensils washing was not covered due 	2023-11-25	Ja [Redacted]

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Minor						
		- Training of the Maintenance team regarding the beading of puff has been initiated.		to lack of awareness and monitoring		
4.6.2	Grease leakages was observed in one of the equipment used for soaking. Note: Verified that the grease used is food grade	- Proper application of the grease on the soaking equipment to prevent the cross contamination. - Training of the Maintenance team regarding the proper application of grease on the soaking machine.	- The check point has been included in pre-operative checklist for daily maintenance of equipment.	- Applying too much grease to a bearing of the equipment due to lack of awareness and monitoring	2023-11-25	Ja [Redacted]
5.7.1	Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023) Verified External Testing from ECO Green Labs India Private Limited NABL TC 10307. Test Report ULR TC10307230005496F dated 20.08.2023. However, Product Release has been done on 18.08.2023. Product Release Checklist FMT/QC/11	- Product Release checklist FMT/QC/11 revised. - Training initiated for the concerned team.	Periodical training for the concerned department for product release. Weekly verification of the records by Senior Technologist	The product was release based on the internal test results by the team due to lack of awareness.	2023-11-25	Ja [Redacted]
8.2.2	Site provides Filtered Air to high-risk area where cooked products are handled. However, facility was unable to provide documentation related frequency of air changes shall	- SOP for air handling revised to include additional details. - Monitoring of air pressure by using Differential Air pressure gauge. - Vendor Technical data sheet and its drawing for Air Pressure Gauge.	- External calibration certificate of the differential pressure gauge - Vendor technical data sheet made mandatory	- facility was unable to provide documentation related frequency of air changes due to lack of knowledge as	2023-11-25	Ja [Redacted]

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Minor						
	be documented and mechanism of confirming maintain a positive air pressure relative to the surrounding areas		for each new installation. - Periodical sampling of air Microbiological Quality are checked.	the standard requirements.		
8.7.1	Inhouse laundry in place. High risk clothing is laundered in hot water, however the minimum temperature for laundering of high-risk protective clothing has not been defined in the SOP for Laundry CCCIII/SSOP/47.	- The inhouse laundry procedure has been revised on temperature of washing during Laundering on the High-risk clothing in hot air dryer. - training for the laundry staff has been done.	- Temperature included in the Internal audit checklist of laundry. - periodical training of the laundry new and existing staff. - Displayed the Temperature settings for high risk clothes washing. - Weekly verification of the uniform swab report by Sr. technologist	- The minimum temperature for laundering of high-risk protective clothing SOP not included in the laundry procedure due to lack of awareness. - Validation of Inhouse laundry to temperature of high-risk uniforms in terms of eliminating the microbial load.	2023-11-25	Ja 

Comments on non-conformities
Effectiveness of Preventive Actions Will be Verified in Next Audit



Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by



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Lead auditor		
Auditor number	First name	Second name
32137	Jairaj	Marcose

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
Ja		321	Lead Auditor	2023-11-02	09.30	18.30	Physical	
Sre		278	Auditor	2023-11-02	09.30	18.30	Physical	
Ja		321	Lead Auditor	2023-11-03	08.00	17.30	Physical	

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Detailed Audit Report

1. Senior management commitment

Product safety and quality culture plan

Interviewed Site Senior most person – Chief Operating Officer as well as General Manager- with regard to Food Safety and Quality Culture within the organization. Top management have a definite vision to improve food safety culture within the organization and are fully committed to the same.

Food Safety Culture Description verified in CCCIII/DOC/17, Describing components of food safety culture Ps – People, Process, Purpose, Proactivity (total 20 components falling into one of the 4 Ps). Last reviewed on 01-04-2023. Trainings related to Food Safety culture evident, for example, verified Food Safety culture - dated 20.10.2023 for 16 personnel. Surveys related to food safety culture have been done in the month of Oct 2023. Feedback related to food safety culture with respect to the above-mentioned components. Food Safety Culture Survey Report Action Plan evident. Planned activities – focussed training and responsibility; Recognition/incentive scheme for employees showing initiative and leadership in place. Site has a system of daily briefings to production supervisors and workers on basic aspects which need to be maintained.

Daily deviation report CCCIII/DDR/01 is maintained by the organisation with respect to practices.

Reviews to be done quarterly. Status of food safety culture plan discussed in MRM Food Safety Culture Review Meeting Minutes.

Site has a copy of the latest Issue 9 Standard available at the site.

Food safety and legality objectives

Food safety and quality policy in place last updated on 01.04.2023, signed by Factory Head and is reviewed yearly during MRM. It shows Commitment to produce safe, authenticity legal, quality product, customer satisfaction, and continual improvement.

The policy is communicated at different work level by displaying in English and local language and through training.

Measurable objectives are established and quarterly monitored. Monitoring record of last year objectives were verified. All achieved. Review frequency is once in three months.

Objectives for the period 2023 reviewed.

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 – achieved
 2. 08 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 – in progress
 6. No rejection of raw material and packing material due to quality of food safety deviations – achieved.
- The food safety & quality objectives being monitored, and results were reported to plant manager at quarterly frequency. Objectives are monitored on a quarterly basis and reported to management on monthly basis. Doc ref: CCCIII/REC/78. Dated 03.10.2023. for July to Sept (quarterly). Continual improvement is achieved by revising objectives and targets. Results of the objectives monitoring are communicated to the key staff through HACCP monthly meetings and recently conducted on dated 26.10.2023. Continual improvement is achieved by revising objectives and targets.
 - However, there is no system to communicate results to all staff at least on a quarterly basis.



Management review

The frequency of MRM is twice in a year. As a continual improvement requirement were reviewed under Management Review Meeting. Last MRM was conducted on 09.10.2023. Circular verified. The list of attendees with their signature is available in File. Minutes CCCIII/MRMM/01. The MRM chaired by Vice President through zoom and attended by 06 key personnel. The agenda discussed includes points like audit findings & CAPA, customer complaints & feedback, process performance, HACCP review, Resource requirement, food safety policy & objectives, review of food safety culture, results of external audits and inspections, food defense and authenticity, resource requirements, environmental monitoring, etc.

The output of the MRM is recorded in terms of upgrading System to meet BRCGS Issue 9.

Previous MRM dated 10.10.2022 also verified.

Regular meetings

Monthly meeting is conducted with department heads along with HACCP team and management, discussed about production issues, food safety, legality and quality issues. Meeting record was seen. Meetings date 26.10.2023 These meetings cover food safety, authenticity, legality and quality, as well as food safety objectives, quality culture etc. Previous meeting minutes verified dated 15.09.2023.

Participation of Site Senior Management in Opening and Closing Meetings

The opening and closing meetings were well attended by Site Senior Most Management – Chief Operating Officer, General Manager.

Previous non-conformity

Preventive actions related to 08 Minor non-conformities reported in last audit were verified to be satisfactory and closed.

Organisational structure, responsibilities, and management authority

The organization has a clear organization chart and clear relationship was documented in FSQMS Manual Site Senior Management is Factory Manager.

The Organogram in Manual (CCCIII/M/001 dated 01/04/2023) Factory is in place. Factory Head, Senior QA Manager, Manager HR/Admin, Purchase manager, Chief Engineer, Divisional Head (Export and Logistics) report to Chief Operating Officer. QC Technologist, production supervisors, and maintenance department is reporting to their respective department managers.

The Job responsibilities were documented in Job Responsibilities CCCIII/DOC/27 and agreed by all the key staff members those are responsible for product safety. Reviewed job responsibilities belongs to Production Manager verified. Delegation of responsibility in case of absence of key person is defined. Job description was verified for (QA manager). In his absence (Sr Technologist) – HACCP Manual.

Managers understand their responsibilities and also cover for absence is clearly documented and assigned. For example, in absence of QA Manager the QC Technologist is responsible. The employees are assigned proper job responsibilities and various work instructions are available for operations undertaken in the plant. The plant is having sufficient resources to maintain and continually improve the food safety quality management system. Adequate supervisory support is present across all the shifts as shift supervisors and shift in-charges.

Delegation of responsibility verified e.g. from HACCP Team Responsibilities

Site has not used any external expertise/consultant. In-house team is well qualified and competent.

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Regulatory requirements are getting updated by regulatory body EIA, FDA and MPEDA and as well as by customer. Top management is member of Seafood Export Association which also update about regulatory requirement and industrial codes of practice. Regular updates for Quality, Safety and regulatory issues are acquired through internet and newsletters- like seafood news also. USFDA guidelines are followed. Update on regulatory requirement of export country is received from buyer through Marketing manager. BRCGS participate registration has been done from the HO. Original copy of the standard is downloaded and is available with the organization.

Reporting food safety issues

Whistle-blowing policy for Confidential Reporting System Procedure documented CCCIII/DOC/21 Confidential Phone number and Secret Suggestion boxes verified during site visit. Suggestion Box Register FMT/GMP/CER/161. Verified with Workers and communication Evident. There were no Reports since last audit. Verified in MRM. Phone number exhibited for anonymous reporting.

Legal docs verified:

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.

Also as per application from site – Export Inspection Agency – has visited site on 29-05-2023 and provided assessment report for additional facilities/processing activities-

- Facility - Steam cooker – capacity 15 tons per day
- Activities – Cooked Frozen Shrimp rings with cocktail sauce; Raw frozen marinated shrimps, processing of black tiger shrimps

Recommendation has been made approval of the same. Findings raised have been closed by facility.

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

Certification of Registration from MPEDA (The Marine Products Export Development Authority) for Shrimp valid upto 04-09-2023

- MPEDA Registration No. AP6/PP/058/222 for Processing plant – plate freezing – 22 MT, Cooked Products – 36 MT
- AP6/SP/075/22 for Storage, AP6/PC/064/22 – 1878 MT- 02 cold rooms
- 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

Minor NC #1 Clause 1.1.2

Surveys related to food safety culture have been done in the month of Oct 2023. However, the Food Safety Survey questionnaire is in English and not available in local language for better understanding and participation

Minor NC # 2 Clause 1.1.3

Objectives are monitored on a quarterly basis and reported to management on a quarterly basis. Doc ref: CCCIII/REC/78. Results of the objectives monitoring are communicated to the key staff through HACCP monthly meetings. However, there is no system to communicate results to all staff at least on a quarterly basis



Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
1.1.13	No BRCGS logo usage on products and in websites/marketing literature.
1.2.4	Site has not used any external expertise/consultant

2. The Food Safety Plan – HACCP

HACCP Team

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 , Mr. S. K.M, 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.

Scope of HACCP

Company involved in processing of raw & cooked (freezing only in IQF) Crustaceans (shrimps), receiving, pre-processing, processing, freezing, cold storing. Raw, raw blanched & Cooked IQF, shrimp product Shelf life of the product is 24 months, storage condition is at of bellow -18 °C, and primary packing material is polyethylene plain cover and laminated duplex. Method of preservation is cooking at 81 to 85 °C at defined belt speeds to core temperature specified in CIFT validation report and freezing to attain product core temperature -18 °C. Ingredients (salt, phosphate chemical (E451) & Non phosphate (E330 & E331) & (Color E160C) properly described and is used as per buyer requirements.

Export Inspection Agency – has visited site and provided assessment report for additional facilities/processing activities-

- Facility - Steam cooker – capacity 15 tons per day
- Activities – Cooked Frozen Shrimp rings with cocktail sauce; Raw frozen marinated shrimps, processing of black tiger shrimps

Intended uses of product have been identified Properly described. The product is to be cook before consumption (for raw products), and cooked product ready for consumption. Intended for General consumer of all age group. Allergen sensitive group is identified. Cooked product 72 °C core temperature and after freezing -18 °C core temp, shelf-life is 24 months. Raw & frozen products -2years

Process flow diagram

Flow diagram was available for all process in HACCP Manual and was found proper. Process flow diagram is verified by HACCP team yearly or during any change, record was available. onsite verification (06.07.2023), of the flow diagram was evident, doc no. CCCIII/REC/05, Issue No.01, dated: 01.04.2023, by 8 HACCP team members, and complies.

Raw Block Frozen- Receipt of raw material (Head _On Shrimp)- Deicing & Washing – Weighing -Re Icing- Size grading- Individual washing-export Grading-weighing- Chill watering/Glaze-Freezing at 40 °C De-

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panning- primary Packing and Labelling-Metal Detection-Packing in Master Carton-Frozen Storage at -18 Deg c.

Raw IQF HL, PDTON, PD, PUD, PVN, PVNTON, EZPEEEL & Deep Cut Shrimps- Receipt of raw material (Head -On Shrimp)- Deicing & Washing – Weighing -Re Icing- Be Heading- Individual washing- Size Grading- Freezing at 40 °C - De-panning- primary Packing and Labelling-Metal Detection-Packing in Master Carton-Frozen Storage at -18 °C.

Blanched Shrimp- Receipt of raw material (Head -On Shrimp)- Deicing, washing – Weighing -Re Icing- Conversion to PUD/PTO Deveined/PND/Headless, washing and Grading – STPP/Salt treatment in Ice-Draining-Steam Blanching-(Core temp 50°C)- Chilling in water-<10 °C - IQF-Glazing/ Hardening-Weighing and packing in Pouches- Metal Detection-Packing in Master Carton-Frozen Storage at -18°C.

Cooked Shrimp- Receipt of raw material (Head _On Shrimp)- Deicing, & Washing – Weighing -Re Icing- Peeling 9PUD/PTO/Deveined/PND/Headless)- Filth washing/ Grading- STPP/Salt treatment in Ice-Draining-Steam Cooking (Core temp 72°C for 15 Sec) - Chilling in water-<10 °C - IQF-Glazing/ Hardening- Weighing and packing in Pouches- Metal Detection-Packing in Master Carton-Frozen Storage at -18°C.

Hazard analysis

Hazard analysis verified for all products. The Hazard analysis has been carried out based on knowledge of experienced professionals; recognized 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 (sulphite, antibiotic, pesticide, heavy metal,) and biological hazards 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.

Critical Control Points, limits and controls

A decision tree has been used to identify CCP. The CCPs identified are as follows: -

CCP# 1- Receipt of raw material- shrimp without sulphite concentration. Aquaculture drugs, / Pesticides, Antibiotics/ Sulphites and PCB, and ethoxyquin. (Sulphite Critical Limit: less than 10 ppm and supplier declaration, For Head on raw shrimp CL less than 100 ppm, Monitoring for every lot- Monitoring visual inspection for supplier declaration and presence of sulphite is through testing kit frequency each received lot, CA- rejection of material for antibiotic CL supplier declaration & antibiotic screening report).. QC Raw material evaluation Report –SOP/QC/17. On 02.11.2023, on shrimp material has received from the Record-Supplier Declaration by Farmer on dated: 01.11.2023. QC Raw material Inward check Report FMT/HACCP/004. On 02.11.2023, Batch Code: SK1P13, H/on shrimp material has received from the Farm– AP032091/002- 5830 Kgs, Farmer – M Fisheries. And from AP032091/003- 5830 Kgs

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.

Metal detector monitoring Report FMT/HACCP/007. dated 26.03.2023.

Validated against USFDA norms for foreign body contamination, customer requirements, validation of metal detector sensitive test for all verity product by HACCP team. During the audit the operator was witnessed for Metal detector at IQF area and Block area.

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CCP-#3 Cooking (CL- Cooking time & temperature as per validation studies by Central Institute of Fisheries Technology to attain product core temperature for 6 D reduction of Listeria – based on F value, cooker temperature 98 °C). Monitoring of cooker temperature, and time for every batch lot. CA- re-cooking. Validation- Product core temperature and retention time as per USFDS Seafood HACCP guideline, Grade 51/60 Cooking time 131 Seconds and 85°C found. Cooking-Production Process record FMT/SOP/228.

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 Report (CCP) FMT/HACCP/009 dated: 02.11.2023. Packing & Labelling monitoring in Online Process Monitoring Report (CCP Record)– Cooked IQF FMT/QC/08. dated: 02.11.2023.

Corrections and corrective actions identified for each CCP Violation in CCP Plan in the HACCP Manual. Corrective and preventive actions procedure verified in CCCIII/SOP/11.

CCP monitoring is done as per plan and record maintained, All CCPs have been validated. USFDA regulations, EU & EIC regulations are reference for validation of CCP like receiving of raw material etc. Cooker validations are done by Central Institute of Fisheries Technology. In house testing also carried out for CCP validation. In house temperature & subsequent microbial test report verified.

Validation, verification, and review

Cooker validations

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 vannamei of different grades.

Frequency of HACCP review is Once in 12 months or whenever any significant change. HACCP review record seen, conducted on 01.04.2023, Including PRP review. Document started on 01.04.2023. The HACCP team is involved in the Review and signature was available for the attendance.

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



3. Food safety and quality management system

3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

Food safety and quality manual

Food Safety and Quality Manual -CCCIII/FSMSM/01 dated 01/04/2023 Issue -01, Rev #0 in place supported by

- HACCP Manual- CCCIII/M/001 Ver 1.3 dated 01-Apr-2023
- SSOP Manual
- cGMP Manual - CCCIII/GMP/001 version 1.2 dated 02-Jan-2023
- Lab Manual - CCC/SOP/LAB Reviewed by QA Manager and approved by General Manager. The Manual addresses all the clauses adequately. The manual is reviewed annually and whenever required and also updated as per Issue 9

Document control

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. Etc.

All Procedures and work Instructions are Legible and unambiguous.

Record completion and maintenance

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 unauthorised access The completed records are verified in Hard and in soft copies.

3.4 Internal audits

Internal audit system is in place. Internal Quality audit procedure Ref: CCCIII/SOP/06 .

The audits are conducted throughout the year in more than four dates. The schedule review is planned after every internal/external audit, customer complaints etc & changes can be made in frequency based on the audit outcome. Confirmed that the internal audits are "scheduled throughout the year" Internal Audit Covers Food safety & QMS, MRM, Customer Satisfaction, Legal compliance, BAP Requirements etc. covering entire scope of BRCGS.



List of Internal Auditors with their competency are verified. 10 Internal Auditors. List in CCCIII/REC/67. Internal audit training record was seen for the internal auditors. 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 Plan verified for 2023 and Internal Audit Schedule CCCIII/IA/02. Internal Audit Covers Food safety & QMS, MRM, Customer Satisfaction, Legal compliances, etc.

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

Internal audit frequency is based on Risk Assessment: CCCIII/REC/045. Based on product of likelihood, severity, previous audit NC factor,

Risk level

- low- annual audit – e.g Senior management commitment – last audit dated 11.09.2023- no findings
- medium – half yearly – Site Security and Food Defence – last audit dated – 21.07.2023 Auditor FSTL and Auditee – Factory Manager – no findings.
- high – quarterly- none identified.

Monthly Fabrication and Hygiene Audits - Doc CCCIII/REC/33 – 14 -09-2023 2 findings raised.

Timeframe for completion is verified. In Non-conformity – RCA/CAPA Report – CCCIII/CAR/01

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Supplier Approval Procedure in Place for Raw Materials, Packing Materials, Ingredients additives and Finished Products. Ref : Procedure for purchase, supplier approval and performance assessment. - CCCIII/SOP/07 for Ingredient & Packing Material Purchase & SOP/DOC/02a for Shrimp Purchase

Risk assessment of ingredients and packaging evident. Last review dated 01-Apr-2023

- High risk – Raw material -shrimp, primary packaging, etc.
- Low risk – Secondary packaging, ingredients such as STPP and salt, food grade grease, cleaning chemicals etc.

Supplier approval and monitoring System verified including the new supplier approval. Supplier approval, monitoring process based on risk assessment is documented based on parameters like allergen contamination, foreign body, micro, chemical & fraud etc.

High Risk - Minimum GFSI certification or supplier assessment audit also considers any legal requirements/any direct customer requirements as well. The approval and monitoring procedure is based on one or a combination of periodic supplier facility audits conducted by competent personnel (QC Manager) covering product safety, traceability, HACCP review, the product security and food defence, the product authenticity and good manufacturing practices/third party audits & certification/supplier questionnaire.

- Packaging – PP packs ISO22000:2018 +PAS 223:2011 valid up to 20-Dec-2024. Migration Test /report from SGS evident dated 16.03.2023.
- Cocktail sauce for Shrimp rings from Win Chance Foods BRCGS Site Code 1367543 valid up to 22 Dec 2023
- Sodium Tripolyphosphate from R&B Food Supply. Which has BRCGS Food Certification- Site code 9469023. valid up to 09 Feb 2024 Including Category 15.
- Raw materials: Raw materials are sourced from farms approved by MPEDA/CAA.



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

Low risk material - The scope of the questionnaire covers GMP/HACCP, traceability, food defence, product authenticity etc. eg. Verified for CC cartons – and Containers. Dated 28-10-2022

Supplier evaluation records evident SOP/QC/23 Verified dated Sept 2023.

Handling of Exceptions is defined - in case of non-availability- criteria is specified e.g. certifications and testing. However no materials obtained from unapproved suppliers in the past one year.

Brokers and Agents were not used



3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The company demonstrates control over its purchasing processes that are critical to product safety, quality and legality. It ensures that the purchased products are as per the requirements specified at the time of receiving material is verified by Q.C representative and COA is obtained as appropriate.

The acceptance procedure for Receiving of Raw material, packing material and ingredients documented in SOP/DOC/02a last updated on 01.04.2023. Inbound materials are used to check thoroughly by the supervisor and QC personnel according to the procedures which duly signed by QA Manager

Raw material receiving is a CCP. CCP# 1- Receipt of raw material- shrimp without sulphite concentration. Aquaculture drugs, / Pesticides, Antibiotics/ Sulphites and PCB, and ethoxyquin. (Sulphite Critical Limit: less than 10 ppm and supplier declaration, For Head on raw shrimp CL less than 100 ppm, Monitoring for every lot- Monitoring visual inspection for supplier declaration and presence of sulphite is through testing kit frequency each received lot, CA- rejection of material for antibiotic CL supplier declaration & antibiotic screening report).. QC Raw material evaluation Report –SOP/QC/17. On 02.11.2023, on shrimp material has received from the Record- Supplier Declaration by Farmer on dated: 01.11.2023. QC Raw material Inward check Report FMT/HACCP/004. On 02.11.2023, Batch Code: SK1P13, H/on shrimp material has received from the Farm– AP032091/002- 5830 Kgs, Farmer – M Fisheries. And from AP032091/003- 5830 Kgs

Packing material quality inspection – SOP/PD/01 dated 15.10.2023 for polybags from PP Pack – for printed and laminated pouch.

Verified certificates of analysis for materials received e.g.

- Tandoori Marinade Batch No. 000047962 - EG Labs India Private Limited, Test report no. TC10307230400708, dated: 2023.04.07, tested for the Escherichia coli, Salmonella, Staphylococcus aureus, Total Plate Count, Vibrio cholera, Vibrio Parahaemolyticus, Coliforms, complies.
- COA: SFI: Harissa Marinade, Sriracha Marinade, Thai Sweet Chilli Marinade, dated: 14.04.2023, 18.04.2023, 22.04.2023, complies for the organoleptic properties, physical & chemical properties, microbiological properties.
- WC: Cocktail sauce (F4T001-1), (J11T044-3), Orange Red, Pungent & Sour aroma with tangy taste, Production Date: 2022.07.27, Expiry date: 2025.01.27, tested for the Total Soluble Solids, Ph, Acidity, Salt, Viscosity, Total Plate Count, Yeast & Molds, Coliforms, complies.

Laminated pouches: PP Packs, Batch No. 080722, dated: 03.08.2022, report date: 13.09.2022, tested for the overall migration, 10% ethanol, 3% acetic acid, 95% ethanol, Bisphenol A content, specific migration of heavy metals, primary aromatic amines (PAA), sensory test: odour and sensory, and phthalate content test, oxygen transmission rate, complies.

3.5.3 Management of suppliers of services

The facility 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 is in place that normally disallows the use of unapproved outsourced supplier or service provider.

List of Service Providers Verified – CCCIII/DOC/72. The facility uses the following service providers
Pest control-Pest control contract – In P Control - Valid upto 28.02.2024 having licence no: C1/101/2012-13

Cleaning services - none

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

Product storage/frozen warehousing- none

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

Catering services - none

· Equipment maintenance and repair



Laboratory testing and Calibration services- -accredited and competent labs
3.5.4 Management of Outsourced processing
Not applicable



3.6 Specifications

Specifications as per the Govt. Regulations and Customer Requirements. All raw materials and other products have specifications to comply with safety and legislative requirements. The following specifications were reviewed and found available: - Raw materials/ingredients, Packaging, In-process product & Finished product.

Raw materials specification verified for (SOP/DOC/02a) Aquaculture Vannamei Head On - Broken shell-10%, Soft shell-10%, Blackspot-10%, Temp.-<+4°C, decomposition, dehydration, discolouration-None, sulphite residue-nil, Antibiotic/pesticide/herbicide residue-nil etc.

Specifications for salt CCCIII/DOC/55 include physical and chemical parameters but the same does not include heavy metal. Laminates and polythene sheet for product wrapping of varied thickness as per pack size. Polythene sheets or polybags specification includes net wt. of the product up to 1 kg 75 Microns.

Specifications for phosphate SOP/29-E

Specification for packing materials seen for Master Carton, broadly recommended by customer and best industry practice. 5 ply with 120 gsm and bursting strength 8kgs/cm².

Finished product specification in CCCIII/GMP/01 was seen for Head Less Shell-On Shrimps, block frozen IQF Raw & Cooked, PD Tail-On Shrimps.

Packing material specification was seen in CCCIII/GMP/01

Verified test reports/certificates of analysis confirming specifications

EG Labs India Private Limited, Test report no. TC10307230400708, dated: 2023.04.07, tested the tandoori marinade, Batch No. 000047962, tested for the Escherichia coli, Salmonella, Staphylococcus aureus, Total Plate Count, Vibrio cholera, Vibrio Parahaemolyticus, Coliforms, complies.

COA:

SFI: Harissa Marinade, Sriracha Marinade, Thai Sweet Chilli Marinade, dated: 14.04.2023, 18.04.2023, 22.04.2023, complies for the organoleptic properties, physical & chemical properties, microbiological properties.

WC: Cocktail sauce (F4T001-1), (J11T044-3), Orange Red, Pungent & Sour aroma with tangy taste, Production Date: 2022.07.27, Expiry date: 2025.01.27, tested for the Total Soluble Solids, Ph, Acidity, Salt, Viscosity, Total Plate Count, Yeast & Molds, Coliforms, complies.

Laminated pouches: PP Packs, Batch No. 080722, dated: 03.08.2022, report date: 13.09.2022, tested for the overall migration, 10% ethanol, 3% acetic acid, 95% ethanol, Bisphenol A content, specific migration of heavy metals, primary aromatic amines (PAA), sensory test: odour and sensory, and phthalate content test, oxygen transmission rate, complies.

Last review of specifications has been done on 01/04/2023. Specification reviewed during annual HACCP review or whenever any changes done. Specifications are reviewed once in year and all the related documents kept by Purchase manager and one additional copy is also kept in quality department for reference.

3.7 Corrective and preventive actions

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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.

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.

3.8 Control of non-conforming product

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 during audit 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 coloured 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.

3.9 Traceability

Procedure is documented in SOP Manual, CCCIII/SOP/13 Rev # 00 dated 01/04/2023. 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 at least once in 6 months.

e.g. 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. Visakhapatnam.

Backward Traceability Tested during audit.

Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023)

Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

Invoice no. TCAM/069/23/24 dated 18.08.2023.

Bill of lading – MEDUZW358200 onboard date 24.08.2023. Container number TTNU8123273 Seal no. FX27435336

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

Overall yield 60.38%

Packing material used – polybag – PP packs – Batch PPP/939

Master carton Cor Cartons CCC/113

STPP – R&B – Batch 230323015



Salt – N Salt – Batch 0523

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

External Testing from ECO Green Labs India Private Limited NABL TC 10307. Test Report ULR TC10307230005496F dated 20.08.2023 Nitrofurans metabolites and Chloramphenicol. No External Testing for microbiology.

Filth Testing done in house and report is available CCC-III/DOC/QALAB-12 – Whole /equi insects, and fragment, mites, other insects, rodent hairs other animal hair.

In-process records

Raw material intake and washing report – FMT/QC/03

De heading Record - FMT/QC/04- Headless 5561 kg 69%

Grading Record - FMT/QC/02 Grade 31/40

Peeled Quantity 4894 kg - FMT/QC/06

Soaking Register FMT/QC/07 – @ 2 % for 2 hours .8 kg each

STPP – R&B – Batch 230323015 Received

Salt – N Salt – Batch 0523 Received hours.

Soak out quantity 5530 kg.

Cooking loss is estimated as 12%.

Cooked quantity – 4867 kg

FMT/QC/08A- Online Processing Monitoring Report –

Cooking –Belt speed 3 mins 40 seconds, product temperature is 74.5 Degrees. Cooker 2.

Freezing parameter also monitored in the same record.

Glazing – Specification 11-13 % - 11.9, 12.0, 12.2, 11.8 % frequency every half an hours

Weightment – 2lb packing – 1033, 1035,1034, 1032 deglazed wight 910, 911,909, 912 gms – manual weightment. Checks carried out every half an hour.

Labelling - Confirmation for allergen evident.

Metal detection – CL – Fe 1.0, NFE 1.5 and SS 2.0 mm.

Packing details also included.

Traceability completed within 4 hours.

3.10 Complaint-handling

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.

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

3.11 Management of incidents, product withdrawal and product recall

Product Recall Procedure Ref: CCCIII/SOP/15. The product recall and withdrawal procedures are tested once in year. Recall is of three types of 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. Also further communication related to actions taken would be communicated to CB within 21 days.

Recall team of 05 members.

The Recall team is led by Senior QA Manager Mr. S [REDACTED]

Final decision is taking by the MD.

Contact details evident.

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.

No actual recalls/withdrawals in the past one year.

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 are periodically conducted (at least once in 3 months). The procedure is addressing both people safety and product safety. Business continuity Plan in case of emergencies verified in the same.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
3.5.1.5	Brokers and Agents were not used
3.5.4	No outsourced processing



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4. Site standards

4.1 External standards

The facility is located within an area with high agricultural activity. There are no polluting industries in the area. The Facility is suitable for the operation taking place and free from chemical or industrial contaminants. No local activities that would risk product contamination. No Rivers or train routes nearby.

Site boundaries are clearly defined with a high compound wall. Fabrication found good for all buildings and found in good repair and well maintained. Road and yards are made up of concrete. Traffic Routes are found proper. Gardens/planted areas are away from production buildings.

Access control is implemented. Storage and sensitive area were properly supervised and found in Secure condition. Incoming and outgoing vehicles are properly monitored by the security personnel. Dormitory outside the Compound wall.

Contractors and visitors are made aware of access restriction and rules related to them. All visitors are having someone on site with the responsibility for overseeing their work and action.

CCTV monitoring system in place and feedback is given to respective supervisors in case of any unusual activity.

No external Storage of materials observed at the site. No external tanks or intake pipes for carrying raw materials or product.

Food Defense Training and Site Security Training dated 19.09.2023 for 67 personnel.

4.2 Site security and food defence

Experienced and competent food defence team in place and include key personnel as members. The food defence team ensure that the mitigation strategies are assessed to verify the implementation of the food defence plan. Confirmed that the food defence team has appropriate knowledge and understand potential food defence risks at the site. No legal requirement for training.

Documented risk assessment system and procedure (TACCP - Threat Assessment Critical Control Points) in place to identify and address food defence risks - Threat assessment and Mitigation Plan CCCIII/DOC/50- Risk assessment of Surrounding and security - Covering Plant security, chemicals security, ingredient safety, finished product security, cyber security, water and ice security etc.

Procedure for Food defence and Biosecurity Program in CCCIII/SOP/17, dated 01/04/2023

Food Defense Training and Site Security Training dated 19.09.2023 for 67 personnel.

Visitor Policy CCCIII/DOC/69 dated Visitor Declaration CCCIII/REC/62 verified.

Security Audit (CCCIII/REC/41A) is done periodically.

Food Security Plan Management Checklist - CCCIII/REC/61

Last Reviewed on: -01.04.2023

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 in each section and monitored by Production Manager and Factory manager.

4.3 Layout, product flow and segregation

Verified Maps- The plant layout is marked with the Processing Unit Layout – Personnel Flow, Product Flow, Waste & packaging material movement (CCCIII/DOC/13) Unidirectional flow was evident for product, waste and utilities describing general layout, zoning, Access points, Company has site plan/several overlapping



maps in which access points of personnel, raw materials and packaging; routes of travel for materials, equipment, people and waste material, production process flow, location of staff facilities is well defined.

Unit has decided the processing zone based on Appendix 2 guidance of BRCGS standard and classified as low risk, high risk, open product areas, enclosed area, non – production areas.

Low risk areas – Receiving section, chill rooms, pre-processing section, processing section (grading and treatment), Raw IQF line and plate freezing line, cooking section (These are also open product areas). Area for handling packed products (including cooked products) and cold storage are also low risk as well as enclosed product areas. Low risk areas are physically well segregated from high-risk areas.

High risk area- High Risk area (for handling cooked shrimp which is immediately chilled in a continuous operation in the IQF line) is completely separated. The partition between cooker and chiller is well designed without any gaps.

Non-product areas - Packing material stores - daily carton, carton store, Laboratory, office, machinery room, water treatment area, ETP, Changing rooms, rest rooms, etc.

Separate Food grade chemical storage and cleaning chemical storage is available. Working space is sufficient. Utensil normally cleaned at separated isolated areas with pocket door for transfer to the utensil storage areas. Washing and cleaning areas are adequately segregated from production areas. Flow of drain water is from high risk to low-risk areas.

No High care area or ambient high care area.

No modernization works in progress during audit.
No temporary structure is found.

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

The infrastructure of the Site has been constructed with materials appropriate for manufacturing industry, regulatory guideline and of permanent nature.

Walls are found sufficiently strong with smooth surfaced and fixed with Tiles to sufficient height, is effectively maintained throughout the plant.

Floor is of Kota stones and was found in good repair condition and properly sloped at all the areas. Drainage system is proper – flow is. Required sloping is provided to ensure effective drainage.

Drainage covered with SS grills. Drainage diagram is available, flow of drain was found proper, and sloping is designed properly to ensure water flowing opposite to the Process flow.

Ceiling of processing area was found made with panels The ceilings are kept clean and there is no accumulation of dirt, no evidence of mold growth and condensation. No suspended Ceilings or Voids.

No Mezzanine Floors or elevated walkways in the Processing area. Only in the Cold stores.

Windows and openings were found properly sealed and protected with mesh. All doors are close fittings with strip curtains and air curtains.

Adequate lighting provided. Light sources are protected for the production and also Insectocutor are numbered with controlled mesh.

Ventilation arrangements were made at inside the manufacturing and storing area. No condensation was observed.

Plastic Strip curtains are used in different area. Found in Good condition and fitted well.

Minor NC # 3 Clause 4.4.1

Partitions walls in Utensil washing room of pre-processing section observed with exposed PUF



4.5 Utilities – water, ice, air and other gases

Water source Borewell. The water is tested against the requirements of 98/83EC as per regulatory guideline, 2 yearly and six-monthly. Maintained water treatment plant before being used in the production. Water is treated underground tank- Sand filter- carbon filter- chlorine dosing- overhead tank- UV sterilisation- Individual line fitted with UV steriliser at production hall. Sample is taken from various points as indicated in plan.

Water Ice and Steam Testing

Test Report from SMS Lab NABL TC- 6118 for water and ice testing as per EC 98/83 (frequency is once in two years as per Export Inspection Agency)– dated 21 March 2022- processing water Tap 12 . ULR No. TC611822000005521F.

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

Also test reports of water from Intertek NABL TC6434 dated 30.10.2023 as per BAP Annex V.

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

Steam Testing Merieux NABL TC -5960 – dated 13-05-2023 – metals Lead, Arsenic, Cadmium, Mercury. Microbiology – APC, coliform count

Daily chlorination report verified (Process water and ice Level- 2 ppm). Floor sanitation 100-200 ppm, Table sanitation 50-100 ppm, Hand dip 20 ppm, Foot dip 50-100 ppm, glaze water <2 ppm. Monitoring record for residual chlorine (pre-processing)

Water tank Cleaning Procedure Verified in Work Instruction. conducted on every 15 days frequency. Verified water tank cleaning record - CCCIII/REC/83 for the months of September and October 2023.

Base tanks of flake ice machine observed to properly covered and in clean condition during audit.

Steam is not used in processing. No other Gases used in the Processing.

No compressed air used for food contact or cleaning activities.

4.6 Equipment

The facility is equipped with 2 Plate Freezers, 2 IQF Freezer, 1 Cooker, 2 metal detectors, 2 washing machine, and 2 Flake ice machines, Tube Ice -1; Grading Machine- 2 Nos; 1 De panning machine.

All equipment found in good condition. A separate Utensil Cleaning area is observed. Equipment is specified, tested and commissioned before commercial use and suitably situated for proper access both for operation and cleaning purposes. All food contact surfaces, and conveyor belt were found made of food grade materials. Other food contact materials are SS-316 sheet. Food grade certificates are available for polythene, crates and containers, and kept in files.

Equipment is specified, tested and commissioned before commercial use and suitably situated for proper access both for operation and cleaning purposes.

It is mandatory for Key new equipment in production with impact on production capacity to be inspected and authorized by regulatory authority. As per application from site – Export Inspection Agency – has visited site on 29-05-2023 and provided assessment report for additional facilities/processing activities-

- Facility - Steam cooker – capacity 15 tons per day
- Activities – Cooked Frozen Shrimp rings with cocktail sauce; Raw frozen marinated shrimps, processing of black tiger shrimps.



Recommendation has been made approval of the same. Findings raised have been closed by facility.

IQF line number 2 was not in use at the time of audit and inspected. Found in satisfactory level of cleanliness and hygiene. Verified status of cleaning of grading machines, Raw IQF machine belts, etc. as these could be verified even during operation. There are no redundant equipment which are not routinely used.

Forklifts are used and Battery charging equipment is kept in a segregated and dedicated area.

Procedure for moving static equipment- no static equipment moved in the past one year.

Minor NC No. 4 Clause 4.6.2

Grease leakages was observed in one of the equipment used for soaking.

Note:

Verified that the grease used is food grade

4.7 Maintenance

Procedure for maintenance is available in CCCIII/. Machine List in CCCIII/REC/15 verified. The facility is equipped with 2 Plate Freezers, 2 IQF Freezer, 1 Cooker, 2 metal detectors, 2 washing machine, and 2 Flake ice machines, Tube Ice -1; Grading Machine- 2 Nos; 1 De panning machine etc.

In house maintenance team is established – 11 operators are reporting to Plant maintenance in charge are reporting to Factory Manager. A Preventive maintenance schedule is in place for all equipment in the plant CCCIII/DOC/39. weekly, monthly & yearly schedule seen for 2023,

Maintenance Records of Cooker -1 and 2- Daily maintenance records verified. Calibration certificate from Laitram - Cooke RTD - dated 04-04-2023 and due by 04-03-2023. Verified external Service reports. Issues with RTD rectified.

Inhouse Temperature validation is done - Quarterly for all zones in place.

Water Treatment plant - UV light change records- on 23.06.2023. D Enterprises. 8000 hrs life.

Boiler maintenance done internally.

Breakdown Register - CCCIII-FMT-QR-MNT-04 - dated 22-Sept-2023 – no parts replaced - 1 hour downtime is recorded. Hygiene clearance post maintenance is recorded in the relevant machine maintenance record QAV/QC/AMV/01. Post hygienic cleaning checks evident.

Food grade lubricants evidenced. Food grade grease Molygraph FGG source is Synthetic, B # 08650720. No allergen is used from the composition verified. Food grade Lubricant oil Omnilube FGG1220 Batch # 004220202137906000003- H1 evidenced.

Engineer workshops were situated away from manufacturing area in separate building. Maintenance room maintained Clean. Tool Controls verified.

Machine List from High Risk verified. Dedicated toolbox with list verified onsite inside the High-risk area

Temporary repair is properly controlled; during site visit no temporary repair was seen.



4.8 Staff facilities

Separate male and female changing facility provided before entering to processing area maintained in clean condition by dedicated cleaning & hygiene staff. Hand wash station with running water, liquid soap and drying facility (Napkins), was evident with proper hygiene and hand washing instruction.

Canteen facility is provided for staff in separate segregated building away from production and storage area, properly managed no chance of risk was seen. Food is not prepared in the facility.

Protective cloths are apron, head cover, mouth mask. Change room facility was founded properly designed.

Locker box is provided at change room facility for staff to store personnel belongings. Smoking is not allowed in factory compound. Smoking policy is documented as part of personal hygiene policy. Toilet facility is physically segregated from production and storage area.

Change room facility is used for wearing protective cloth for all section. Separate eating area is provided for employees. No cooking is done inside premises. Food brought in by employees are separately stored in the eating area.

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

4.9.1 Chemical control

Approved list of Chemicals CCCIII/DOC/53 verified. Chemical used includes Sodium Hypochlorite, Salt, and Disodium Phosphate Etc. Special area provided for keeping such chemicals and Issue through controlled Registers to concerned people. Training on the handling of chemicals and hazardous materials has been conducted on 17/08/2023 Internally during when 25 employees have been trained including on spillage handling.

Only liquid soap and chlorine are used inside production areas.

Storage under Lock and Key. Material safety data sheet- verified for the Sanitisers, suitable to use in the food processing facility. Separate storage is evidenced for Sanitising chemicals and other non- food chemicals. MSDS verified. All the chemicals used in the process environment are identified with label and identification and no contamination evidenced. Food grade compliance also demonstrated for the same. The overall control was vested with QA.

4.9.2 Metal control

Metal Control Policy- CCCIII/DOC/56. Metal policy includes sharp metals, pins, staples etc. The foreign body control and detection equipment is as follows: - washing of raw material- physical sorting- finally

Metal Detection before packing. Documented procedure is available for controlling the metal at the factory, risk assessment has been done. Knife, Scissors, Needles, blade and sharp metal policy is documented. Snap off blades is not allowed to be used in processing area.

Daily checklist for Foreign body item is maintained in SOP/DOC/94, report was seen for the month of Sept and Oct 2023. Verified during site visit. Used for packing is properly stored and inspected to avoid any contamination. All the equipment used at the process is SS type. Packaging material used is free of stapler pins.



4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass policy and Brittle Plastic policy covered in Foreign material control Policy (CCCIII/DOC/70) as part of Foreign material control Programme in FSMS Manual. . Procedure for Handling Broken Glass and Brittle Plastic verified in CCCIII/SSOP-01

Any glass particle or glass instruments are not allowed inside the manufacturing. Glass windows are numbered. It also states the actions to be taken in case of any glass or hard plastic breakage incident happens. Glass windows protected with films. Monthly audit is done to check the condition of glass individually and record is maintained on Glass checklist SOP/QC/14, Wood is not used in the processing area

No glass/brittle plastic breakages since last audit.

Light sources are protected adequately inside the manufacturing area. Glass maintenance Checklist

Reports verified for the month of Oct 2023; daily monitoring is done.

Product handling during glass breakage is defined in document.

Unit is not using any glass container or for packing of product, primary packing is done in polyethylene pouch and coated or laminated paper tray.

Inspection of tray is done before and during packing.

4.9.4 Products packed into glass or other brittle containers

No product is packed in glass or brittle container

4.9.5 Wood

Wood is not used in wet area and processing area; wooden pallet used is frozen store and condition of pallet is monitored. Wood control policy CCCIII/Doc/70 is documented. Wooden pallet monitoring Record verified.

4.9.6 Other physical contaminants

Procedures are in place to prevent contamination of raw materials by raw material packaging, and control of pens in the production facility was available.

Procedures are in place to prevent contamination of raw materials by raw material packaging. In the production Pins and staples are not allowed and loose metal part are inspected by the maintained on the daily basis Pen control program is included into Pen control Policy in place, specified with use of pen without cap, loose body design, metal detectable. Control of pens in the production facility was evident.

De-boxing procedure is not applicable as raw materials are received in crates with ice.

Handheld thermometers are dedicated for their uses for example - temperature checks of raw materials, in-process materials, frozen materials. Only low risk products handled in this facility.

Pens are company issued and controlled. Metal detectable pens with no loose portions were found used in the Plant.

Mobile phones, tablets and similar portable items are not allowed in the production areas. Only recording formats are provide as stationery. No other stationery is provided. Staplers are not allowed.



4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
<p>The foreign body control and detection equipment is as follows: - Filth washing of raw material- physical sorting- finally Metal Detection before packing. Risk assessment for foreign body contamination was done along with HACCP study. Metal detector monitoring is once every hour.</p> <p>System is implemented to investigate the source of metal contamination. Filters used for glazing & soaking in place. Filth washing machine is available before grading product is passed through Filth washing machine, During the manual grading and Value addition manual product is inspected for any contamination. Packing aids, used for packing is properly stored and inspected to avoid any contamination.</p>
4.10.2 Filters and sieves
No Sieves or filters used in the facility for production
4.10.3 Metal detectors and X-ray equipment
<p>The foreign body control and detection equipment is as follows: - washing of raw material- physical -finally Metal Detection after packing. Sensitivity of metal detector is For Block & IQF Fe – 1.5 mm, Non-Fe – 2.0 mm and SS -2.5 mm. Metal detection process is considered as CCP. Documented procedures are established for operation of metal detector as well as for taking necessary corrective actions upon detection.</p> <p>Sensitivity check with standard test piece is getting carried out as per the plan at every hour and recorded, record verified for date of audit. Metal detector is belt stop system with alarm. The limits established are validated as per Customer requirements and best industry practice. Also verified during audit day and found satisfactory.</p> <p>Auto Rejection system, alarm, Light system was evident in case of detection of metal, verified during site visit.</p> <p>No failed test was reported in last 6 months. Metal detector demonstrated effectively by staff, they were well aware of failure process - isolation of stock and retesting. Metal detector Operator is trained and authorised for it. Interviewed the operator. Found Satisfactory</p> <p>Risk assessment for foreign body contamination was done along with HACCP study. System is implemented to investigate the source of metal contamination. Verified the sensitivity during site visit. Interviewed concerned person and found aware of the system. No X-ray equipment is used by site</p>
4.10.4 Magnets
Not applicable. Magnet is not used in the process
4.10.5 Optical sorting equipment
Optical sorting is not used in the process
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No product is packed in glass jars, cans and other rigid containers
4.10.7 Other foreign-body detection and removal equipment
Not applicable. No other foreign body detection and removal equipment such as gravity separation, fluid bed technology or aspirators



4.11 Housekeeping and hygiene

Processing facility was found maintained in cleaned and hygienic condition. Cleaning is done by in-house cleaning team. Master Cleaning Schedule CCCIII/DOC/34.

The surroundings and Processing area found Clean. Work surfaces found in clean and good condition. Cleaning & Sanitation Procedure SSOP Manual CCCIII/SSOP/01-54 dated 01/04/2023. Records bear, Dated, Recording of Observation and Results, Signature of Persons checking it and that of verifying person. Master cleaning, weekly and daily cleaning schedule HACCP Manual is also documented. Master Cleaning and included the Weekly & Daily Cleaning of food production area and non-food production area are verified and found updated. Verified reports in Oct 2023. Vehicle cleaning Report QC/SAN/23 verified. Cleaning method: manual cleaning with water pressure, use of brush, dismantling of equipment, approved sanitizer, soap solution is used, and COP is followed. SSOP manual in HACCP Manual which contains cleaning procedures for various areas, food contact surfaces, non-food contact surfaces, water tanks, cold storage etc.

Daily Sanitation Record – FMT/SSOP/04. Weekly Cleaning checklist CCCIII/DOC/34.

Daily Chlorine Checklist Verified in Pre-operational checklist. Verified for Sept 2023. Found OK. Thorough cleaning is done every day before production for process area equipment with soap solution, sanitisation with 50 ppm chlorine for food contact surfaces. 500 ppm for foot washing, 50 ppm for hand cleaning Drains, floors - 500 ppm used. (As Per GACC Requirement) Cleaning with water is done for the equipment after completion of production. Verified the chlorine Level during site visit. Found OK.

Cleaning records verified. Change over cleaning Procedure verified. Report verified in Register of Sanitary standards.

High risk area cleaning procedure was documented in Master Cleaning and Sanitation Schedules (BSM/07 Dated 26.03.2023) and reviewed Pre-Operational Checklist for Cooking Line verified, complies.

Pre-Operative & Workers -Hygiene Checklist, Doc No. SSOP/PD/04, dated: 01.11.2023, & 02.11.2023, Day Code: 3L01, A Shift, High Risk Zones covered for the Line Chlorination,

Hygiene & Sanitation Record, Doc No. FMT/SSOP/04, dated: 02.10.2023, Cooking IQF Areas, Utensils, Packing Areas, Cist Shell Waste Room, CIST Room, Cold Storage Area, DPMS Area, covered for the no. of workers allotted and complies.

Through cleaning is done every day after completion of production for process area equipment with soap solution, sanitization with 50-100 ppm chlorine and then rinse with running water for food contact surface. Water jet is used to remove physical dirt from IQF belt. Hand wash is 20 ppm Micro swab is taken daily for different operation areas. Micro results are reviewed for the month of January 2023 to October 2023. High risk area cleaning equipment are separately colour coded and dedicated cleaning staff appointed for this zone. Listeria is tested on 05.05.2023, for cooking area. Visual inspection is carried out by the QA during the production. Personnel hygiene checklist for High Risk done verified for January 2023 to October 2023. FMT/SSOP/178.

IQF line no. 2 was not in operation during audit was inspected and found satisfactory.

4.11.7 Cleaning in place (CIP)

Not applicable. CIP is not used

4.11.8 Environmental monitoring

Environmental Monitoring Policy and Swabbing Procedure CCCIII/EMP/01 dated 01.04.2023 is based on risk.

The facility is divided into 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 samples 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 equipment, 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), coliforms, Y&M, E. coli, Salmonella and Listeria

Aerobic Plate Count, Coliforms, Yeast & Moulds, Salmonella, Listeria, S. aureus, V. Cholerae. Test timings: Pre-Operation: After Sanitation but the before start of the production, Pre-Operation: After sanitation but before start of production, at least 3 hours into production shift, and At least 3 hours into production shift.

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 verified dated 30.09.2023.

Results discussed in every MRM and reviewed annually. Review of the Environmental monitoring programme including swab testing of food contact surfaces is done on 01.04.2023.

No adverse trends.

4.12 Waste and waste disposal

Procedure for waste removal in CCCIII/SSOP-01 dated 01/04/2023. Plant sewage is collected and treated in a septic tank located in an isolated area within the plant. This process is adequately controlled to avoid contamination of the environment, food production areas, employee rest and housing areas, and water supply.

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. Shrimp Waste Removal Contract with M/s. K L S Bio-Tech, Kakinada validity for 3 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.

Plastic & Master Carton Waste Removal Contract was seen with Vendor M/s Sarvani Plastics, West Godavari dated 24/04/2022 and is valid up to 23/04/2024. Customer labels are disfigured before disposal.

Dedicated waste collecting bins with ash colour evidenced in the processing plant.

The other solid waste like plastic, cartoon boxes, glass bottles, labels are segregation was evident. Waste containers are Covered properly. Destruction these materials done under the supervision of the company staff.

Waste oil disposed records are maintained and updated by the Engineering Department. Unit remove used oil through approved contractor. Hazardous waste Monitoring Record (Oil) verified.

Lab wastes decontaminated and send to ETP.

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

Litter & Scrap is properly stored and timely disposed of 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.



4.13 Management of surplus food and products for animal feed

No surplus products
 No customer branded surplus product is handled.
 No By products intended for animal feed

4.14 Pest management

Procedure for Pest Control in place. Preventive pest control program is implemented by providing air curtains, strip curtains, self-closing doors, grates on drains and sealed windows and keeping the premises clean. Litter & Scrap is properly stored and timely disposed of 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.

Bird controls by guarding all the openings to outside and all area covered with nets to avoid sitting places. No Birds observed.

Pest control contract - Innovative - Valid up to 28.02.2024 having licence no: C1/101/2012-13

Operators - G. Venkata Ram - Training record - 03 Aug 2023.

Approved Chemicals 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. – Service Record - Flies/mosquitoes/spider/lizards

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.

Pest control audit report by expert contractor evident - dated 03.09.2023. Frequency every 3 months based on risk assessment.

Trend analysis verified for the months from Sept 2022 to Aug 2023.

Employees aware of the need to report pest sightings, verified through interview

4.15 Storage facilities

Risk Assessment for Storage of Raw materials, Packing Materials and Final products were done in HACCP manual. Storage procedure is defined in document in HACCP manual. Separate area provided for Raw materials, Packing Materials and Finished products.

Materials found stored on SS pallets in the Raw material store Chill Room Kept under +4°C. Chill room temperature control verified. During site visit chill room temperatures 3.0 °C

Materials Stored off the floor and away from the Walls. Final products stored in cold storages- below -18°C. Cold store temperature verified. – 24°C during site visit. Daily Monitoring Record FMT/SOP/22. Temperature control through Data logger and Physical verification at every hour. Machine room Log sheet verified. Part used packing materials kept separately with clear identification. Temperature control required for Product Storage. No Outside Storage.

Shelf-life control evidenced. Stock Register Verified in soft. FIFO is maintained by Monitoring the Day codes. Verified the CDPR Record and Code list.

4.16 Dispatch and transport



Dispatch Procedure in Shipment & Product Release SOP/22A.

Dedicated bay for loading products in place attached to finished product warehouse. Procedure for Loading and Transportation Verified. All containers inspected prior to loading of product and monitoring records maintained.

Company operates their own insulated vehicles for transport of raw materials. Reefer containers from recognized freight services are used for transport of finished goods and transportation requirement is at or below -18 Degree C. Temperature data logging device is fixed with refrigerated container, used during transportation. Ingredients and packaging transport arranged by suppliers. Transportation procedure is defined.

Finished product is dispatched and transported for export in sealed condition with unique seal No and container No, container sealing is done in presence of Govt. Officials.

Product handling procedure during breakdown is addressed in documented procedure.

Manual loading is done.

Temperature data logging device is fixed with refrigerated container as per customer requirements, used during transportation.

Verified shipment records for

Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023)

Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

Invoice no. TCAM/069/23/24 dated 18.08.2023.

Bill of lading – MEDUZW358200 onboard date 24.08.2023. Container number TTNU8123273 Seal no. FX27435336

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.

No loading was planned during the day of the audit.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
4.3.6	No Temporary Repairs
4.4.6	No elevated walkways and mezzanine floor.
4.9.4	No product is packed in glass or brittle container.
4.9.5	Not applicable. Wood is not used in wet area and processing area
4.10.2	No Filters & Sieve
4.10.4	Magnet is not used in the process
4.10.5	Optical Sorters were not used in the process.

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4.10.6	No product is packed in glass jars, cans and other rigid containers
4.10.7.1	Not applicable. No other foreign body detection and removal equipment such as gravity separation, fluid bed technology or aspirators
4.11.7	No CIP. Not applicable in Seafood industry
4.13	No surplus product and by-products intended as animal feed.

5. Product control	
5.1 Product design/development	
<p>The Facility is not actively involved in product design and development activities. New product development (modification of existing product) is getting carried out as per the instruction and requirement of customers by the way of sample preparation and getting approval from buyer. New product development is done based on HACCP based study. Shelf life of the product is established based on the industry practice.</p> <p>Shelf life of the product is validated in-house for product Raw IQF Shrimp, Block Vannamei shrimps Etc</p> <p>Choice Canning Company Unit III, doc no. CCCIII/REC/71, Frozen cooked peeled, & Deveined Tail on Shrimps IQF, Treatment with the Salt & STPP, Organoleptic inspection: started on 2022.10.17, 2023.01.09, 2023.04.12, 2023.07.18, 2023.10.14, complies. Microbiological analysis: TPC Level, Coliforms, Staphylococcus aureus, Vibrio cholerae, Vibrio parahaemolyticus, Salmonella, Listeria monocytogenes, TVBN, inspection: started on 2022.10.17, 2023.01.09, 2023.04.12, 2023.07.18, 2023.10.14, complies.</p> <p>Ongoing shelf-life studies for Marinated shrimp, Shrimp rings and sauce</p> <p>On-going Shelf-life samples are available in cold store. The labelling of products is as per legislative requirements and customer guidelines.</p>	
5.2 Product labelling	
<p>The labelling of products is as per legislative requirements and also customer guidelines. Product label is designed by customer and brand owner, same is verified by factory QA, required information is provided to customer while designing Label artwork.. Artwork approval is managed by Software VICIECM. QA Manager is responsible for artwork approval.</p> <p>Label and artwork verified for Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023) Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg Invoice no. TCAM/069/23/24 dated 18.08.2023. ingredients – Farm raised Shrimp, salt sodium tripolyphosphate, and water. Country of origin- Product of India, grade net weight, production code, expiry date (24 months), frozen statement, thawing and cooking instructions. BAP logo is used on pouch.</p> <p>Facility is certified to BAP SPS Standard- Certificate valid up 01 Jan 2024.</p> <p>Product is frozen/raw shrimp, production process and formulation; don't have impact on product natural Nutritional value changes.</p>	



5.3 Management of allergens

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

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

No temporary/contract workers in the facility. Contractors are briefed upon allergen policy before entry. No powder allergen is used in open process area. No claim is made regarding the suitability of a food for allergy or food sensitivity sufferers.

No rejection or complaint was reported due to allergen contamination since last audit.

Allergen information is collected from ingredient supplier.

No allergen claims on product labelled.

No rework activity is performed.

No claim is made regarding the suitability of a food for allergy or food sensitivity sufferers.

Change over cleaning Procedure verified.

No Changeovers witnessed during the audit.

5.4 Product authenticity, claims and chain of custody

Product authenticity & Vulnerability assessment procedure verified Ref: CCC/III/DOC/64 last reviewed in 01-04-2023. Mitigation measures in place. Considers vulnerabilities to raw materials at different stage of the supply chain from raw material harvest, purchase, transportation, receiving at factory etc. It considers historical evidence, Economic factors, Ease of access to the supply chain, sophistication of routine testing to identify adulterants, the nature of the raw material.

Interviewed personnel responsible for food fraud assessments and found them aware of potential food fraud risks at the site as well as the principles of vulnerability assessment.

Mitigation plan in place. Company is doing single product in this site shrimp, as shrimp purchase is done approved CAA registered farms and are registered with MPEDA and tested for visual inspection for species variety and each pond is audited before harvesting. Shrimps are purchased and transported from different aquaculture farms through own insulated vehicles only. Sealing is done at farm in front of company representative and same has been ensured during receipt at factory by QC representative. 100% inspection at pre-processing is there to ensure no different species material goes forward for processing & packing in different name.

There is no historical evidence on substitution of blended phosphates as they are from approved sources. Checking of each lot at receipt and packing, sealing condition of the ingredients is being checked.

Last review of vulnerability assessment done in 01.01.2023

No claims relating to provenance.

The facility is certified for BAP Seafood Processing Standard and uses BAP logo on the product label/packaging with 2 / 4 star claims. BAP Certification found to be valid.

No organic /GMO product is used.

5.5 Product packaging

Product packaging was developed based on the best industrial practice, regulatory and buyer requirements which was found suitable for intended use. Laminated duplex cartons with inner polyethylene liner as primary



packing and corrugated multi-layer Master cartons are used as secondary & tertiary packing for packing of frozen product. Physically segregated packing material store is available.

Suppliers are communicated on the Packing Material specifications. Product packaging was developed based on the best industrial practice, regulatory and buyer requirements which was found suitable for intended use. Laminated duplex cartons with inner polyethylene liner as primary packing and corrugated multi-layer Master cartons are used as secondary & tertiary packing for packing of frozen product. Physically segregated packing material store is available.

Declaration is on food grade records verified and found comply with the IS standard.

Migration Testing from TUV SUD South Asia – for plain pouch – from PP Packs– Report no. GGNH(FCM)/23/002138 dated 2023.09.28 as per EU 10/2011 and amendments. Overall, specific, PAA, phthalates, Bisphenol A

Migration Testing evident for PS Plastic Tray – dated 23 Jan 2023 and Migration test report for HIPS trays also evident and verified.

Certificate of analysis and COC is collected from supplier with regard to suitability of packing material. Packing material is properly stored and protected. Food grade compatibility certificates of printing ink and code slips verified. Obsolete Packaging are considered as waste and disposed as per Waste disposal Procedure

5.6 Product inspection, on-site product testing and laboratory analysis

The company has an in-house lab as well as subcontracts product and water testing to outside labs. In-house laboratory is physically segregated from processing area. The sampling scale is documented. Internal and External laboratory analysis plan and process monitoring plan is prepared in sampling procedure manual based on regulatory body EIA guideline.

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. A comprehensive sampling and testing plan covering EIA, BAP, customer requirement also is available authorized by FST including raw material, finished product, Water and ice, Chilled water and glaze water, steam, Effluent, drinking water, additives, etc. Russian requirements - radionuclides, PCB, Dioxin, virus etc. have also been included.

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

All External lab testing is done by NABL accredited labs

- ITC Analytical Services NABL Accreditation number TC-5459
- ECO Green Labs India Private Limited NABL Accreditation number TC 10307
- SMS Lab NABL Accreditation number TC- 6118
- Intertek NABL Accreditation number TC6434
- Merieux NABL Accreditation number TC -5960
- Validity of accreditation confirmed.

Raw Material Testing

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.

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parahaemolyticus, Staphylococcus aureus, Salmonella) is tested at in-house laboratory for every lot (vehicle wise) Format # CCCIII/DOC/QALAB/22/07A/07C.

Also raw material is tested externally once in 06 months as per EIA Requirements.

Also 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 20-09-2023

Finished Product Testing

Test report form ITC Analytical Services NABL TC-5459. ULR No. TC54592300003564F dated 09-07-2023. Product Cooked Frozen Peeled Deveined Tail On IQF Vannamei Shrimp – Codes 3F22,3F02,3F24. Covering all parameters as per BAP Annex IV except for Fluoroquinolones and florefenicol which are included in Test Report no. ITC/23-24/AQ22000488812_P1/2N.

Microbiology parameters evident in Test report no. ULR No. TC54592300003564F as per BAP Annex including Listeria

Test Reports from ITC Labs also evident for Raw frozen Easy Peel Deveined Tail On Shrimps -IQF Vannamei – dated 09-07-2023 for both Chemical and Microbiology Testing as per BAP Annex 5.

Test Reports from ITC Analytical Services dated 08-08-2023 evident for Cooked Frozen Peeled and Deveined Tail On Penaeus monodon Shrimps – Batch 3G24 and 3G26- covering all BAP Annex IV parameters

External Testing from ECO Green Labs India Private Limited NABL TC 10307. Test Report ULR TC10307230005496F dated 20.08.2023 Nitrofurans metabolites and Chloramphenicol. No External Testing for microbiology.

Verified test reports – internal/ external as part of traceability exercised for Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023) , Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

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

Inhouse ELISA Testing reports in place and verified.

Filth Testing done in house and report is available CCC-III/DOC/QALAB-12 – Whole /equivalent insects, and fragment, mites, other insects, rodent hairs other animal hair.

Test Report for Butterfly marinated shrimp- Batch Code 3E29 (Date of Production is 29 May 2023) 10x 2 lb – Microbiology 30.05.2023.

Inhouse Antibiotic test report dated 30-05-2023

Test report for Cooked in shell tail on Shrimp Ring IQF -12 oz shrimp in High Impact Polystyrene (HIPS) Pack + 4 Oz cocktail sauce packet - Batch Code 3E29 (Date of Production is 29 May 2023) -

Ingredients and additives

EG Labs India Private Limited, Test report no. TC10307230400708, dated: 2023.04.07, tested the tandoori marinade, Batch No. 000047962, tested for the Escherichia coli, Salmonella, Staphylococcus aureus, Total Plate Count, Vibrio cholera, Vibrio Parahaemolyticus, Coliforms, complies.

COA:

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SFI: Harissa Marinade, Sriracha Marinade, Thai Sweet Chilli Marinade, dated: 14.04.2023, 18.04.2023, 22.04.2023, complies for the organoleptic properties, physical & chemical properties, microbiological properties.

Cocktail sauce (F4T001-1), (J11T044-3), Orange Red, Pungent & Sour aroma with tangy taste, Production Date: 2022.07.27, Expiry date: 2025.01.27, tested for the Total Soluble Solids, Ph, Acidity, Salt, Viscosity, Total Plate Count, Yeast & Molds, Coliforms, complies. Cocktail sauce is packed along with shrimp rings but without contact to product.

Sodium Tripolyphosphate STPP- Test Report from Merieux – dated – 02-06-2023 for STPP (R&B Food Supply) for 230323015 – Purity, heavy metals, etc. Supplier is H Chemicals – Agreement date 03 Oct 2023

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

Packaging Material Testing

Laminated pouches: PP Packs, Batch No. 080722, dated: 03.08.2022, report date: 13.09.2022, tested for the overall migration, 10% ethanol, 3% acetic acid, 95% ethanol, Bisphenol A content, specific migration of heavy metals, primary aromatic amines (PAA), sensory test: odour and sensory, and phthalate content test, oxygen transmission rate, complies.

Water Ice and Steam Testing

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. Frequency once in 2 years.

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

Also test reports of water from Intertek NABL TC6434 dated 30.10.2022 as per BAP Annex V.

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

Steam Testing Merieux NABL TC -5960 – dated 13-05-2023 – metals Lead, Arsenic, Cadmium, Mercury . Microbiology – APC, coliform count

Sanitary Samples – Swabs

Sanitary samples analysis register verified for the month of October: 30.10.2023, CCC-III/OPRP/QC/01, Water in High Risk & Low, Ice High Risk & Low risk, Green Box, Conveyor Belt, Workers Hands, Packing Area, Apron, Air, PPC Swabs, NFCs: Drainage Alfa I, & Waste Bins, targeted for the TPC, Coliforms, Coliforms, Vibrio, S. aureus, and Listeria and found to be in compliance.

Procedures in place to ensure the reliability of laboratory results such as ring testing, use of appropriately calibrated and maintained equipment, qualified and/or trained and competent staff etc

Laboratory Personnel are competent- have attended EIA Training on ELISA Lab and Method Validation for Antibiotic residues in Fish and Fishery Products Elisa Training from Kit Supplier Mizal Biovet for Three laboratory Personnel - in 2023.

Specific Regulatory Training/approvals - Certificates of Approval of Technologist meant to Handle Fish and Fishery Products for Export - 04 Technologists.

Mr. P. B - Certificate of Training by EIA on Microbiological Testing, GOI Notifications, EIC EK, Instructions and Regulations of Importing Countries of Fish and Fishery Products verified for 021-Aug-2023

Mr. AT - Technologist - MPEDA Training 4 days from 06-Dec-2022 for US Seafood Regulations



21 CFR Part 123 and cGMP (21 CFR Part 117) and Sanitation Control Procedures. Course also covers Govt of India, EU, and other international regulations relevant to processing and Export of Fish and Fishery Products

The facility participates in proficiency testing organized by the Competent authority – Export Inspection Agency.

All laboratory equipment are properly calibrated and checked. Refer 6.4 for calibrations of laboratory equipment.

5.7 Product release

Documented Product Release procedures are available in CCCIII/SOP/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. Verified records Dated 18.08.2023 Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023) Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg. Invoice no. CAM/069/23/24 dated 18.08.2023. Bill of lading – MEDUZW358200 onboard date 24.08.2023. Container number TTNU8123273 Seal no. FX27435336

Minor NC # 5 Clause 5.7.1

Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023) Verified External Testing from ECO Green Labs India Private Limited NABL TC 10307. Test Report ULR TC10307230005496F dated 20.08.2023. However, Product Release has been done on 18.08.2023. Product Release Checklist FMT/QC/11

5.8 Pet food and animal feed

No applicable. No Pet food or animal feed products

5.9 Animal primary conversion

Not applicable. No live animals received. No slaughtering

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.8	Pet food is not handled onsite. Not Applicable
5.9	Not applicable. No live animals received. No slaughtering

6. Process control

6.1 Control of operations

Process controls are documented in Manuals. Control of Processing Operations are evident from RM Receipt to the Dispatch. Process monitoring checks conducted include- at the time of receiving of shrimp as per sampling plan – discussed earlier. Online monitoring of product temperature, organoleptic

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parameters, grade, treatment parameters, checking of glaze %, gross weight and net weight of the product, freezer temperature, frozen product temperature.

Online process monitoring is done every 30 minutes.

Verified process controls and records as part of traceability and during site visit.

Details

Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023)

Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

In process records

Raw material intake and washing report – FMT/QC/03

Deheading Record - FMT/QC/04- Headless 5561 kg 69%

Grading Record - FMT/QC/02 Grade 31/40

Peeled Quantity 4894 kg - FMT/QC/06

Soaking Register FMT/QC/07 – @ 2 % for 2 hours .8 kg each

STPP – R&B – Batch 230323015

Salt – N Salt – Batch 0523

Soak out quantity 5530 kg

FMT/QC/08A- Online Processing Monitoring Report

- Cooking –Belt speed 3 mins 40 seconds, product temperature is 74.5 Degrees. Cooker 2.
- Freezing parameter also monitored in the same record
- Glazing – Specification 11-13 % - 11.9, 12.0, 12.2, 11.8 % frequency every half an hours
- Weightment – 2lb packing – 1033, 1035,1034, 1032 deglazed wight 910, 911,909, 912 gms – manual weightment. Checks carried out every half an hour
- Labelling - Confirmation for allergen
- Metal detection – CL – Fe 1.0, NFE 1.5 and SS 2.0 mm.
- Packing details also included

Work instruction, specification for treatment, SOP was available for all critical process.

All Critical processes controlled as CCPs. Metal detector Operation verified. Found only Experienced and trained authorized personnel were used at the key areas. Interviewed the Metal detector operator.

Process validation is done. Documented line checking during starting of production is done.

Procedures is in place to establish the safety status and quality of the product to determine the action to be taken in the event of equipment failure or deviation of the process from specification.

All packaging material are properly identified, and correctly applied. Proper supervision was noted during production and product change over. Detailed in 6.2 section. Work instruction, specification for treatment, SOP was available for all critical process. Process validation is done. Documented line checking during starting and changeover of production is done.

No by-products produced by the site. Only shell waste is produced which is appropriately collected and disposed of through licensed contractors.

6.2 Labelling and pack control

During the incoming approval QA will verify for each label and approve, During the line inspection – Packing in-change& QC personnel will verify, during the production start and each change over and every 60 minutes.

The labelling of products is as per legislative requirements and customer guidelines.

Product label is designed by customer and brand owner, same is verified by factory QA, required information is provided to customer while designing Label artwork. Artwork approval is managed by Software VICIECM. QA Manager is responsible for artwork approval.

Label and artwork verified for Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023)

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Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

Invoice no. TCAM/069/23/24 dated 18.08.2023.

ingredients – Farm raised Shrimp, salt sodium tripolyphosphate, and water. Country of origin- Product of India, grade net weight, production code, expiry date (24 months), frozen statement, thawing and cooking instructions. BAP logo is used on pouch.

No additional claim is made for product to satisfy any specific group of customers through nutritional claim. Product is raw shrimp, production process and formulation; don't have impact on product natural Nutritional value changes.

No changeover of product during audit.

No online Systems for verification of labels

6.3 Quantity, weight, volume and number control

Online checks for quantity verification including weight check and grade check are conducted as per documented procedures; regulatory requirements and customer specifications are followed.

Net drain weight and net weight is verified by QC during online production every 30 minutes against declared weight and before product release as per finished product sampling protocol, related record was maintained.

Online checks for quantity verification done during site visit as well as part of traceability exercise

Product Frozen Cooked Peeled Deveined Tail on Shrimps IQF Batch no. 3H07 (07 Aug 2023)

Packing style 5x 2lb. Master cartons 1072 nos. Net weight 4867 kg

FMT/QC/08A- Online Processing Monitoring Report –

Weightment – 2lb packing – 1033, 1035,1034, 1032 deglazed wight 910, 911,909, 912 gms – manual weightment. Checks carried out every half an hour.

6.4 Calibration and control of measuring and monitoring devices

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. Calibration schedule is documented for the year 2023 both internal as well as external. Calibration Schedule of 2023 also verified.

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, 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

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 Temperature Indicator with sensor for Cooker zone-2 -dated 10-05-2023 due 09-05-2023
- CC309522000003265F - Electronic balance SI. 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

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Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.1.7	No by-products produced by the site. Only shell waste is produced which is appropriately collected and disposed of through licensed contractors.

7. Personnel

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

Company has appointed adequately trained, experienced and competent staffs and deputed at key positions whose activity effects product safety, legality and quality
 Training procedure is documented in CCCIII/SOP/18.
 Training needs were identified as per Skill Matrix and training program organized regular interval.
 Annual training planner for the year 2023 is in place CCCIII/DOC/41 covering all training topics.
 Training attendance and Effectiveness Record are maintained.

Training Records verified. Trainer is FSTL/other QA Personnel

- HACCP training for CCP operators dated 23-09-2023 - 17 personnel covering CCPs Raw material receiving, cooking, labelling and pack control and metal detection.
- Trainings related to Food Safety culture evident, for example, verified Food Safety culture - dated 20.10.2023 for 16 personnel.
- Allergen control dated 07.10.2023 for 105 personnel.
- Food Defense Training and Site Security Training dated 19.09.2023 for 67 personnel.
- Training on the handling of chemicals and hazardous materials has been conducted on 17/08/2023 Internally during when 25 employees have been trained including on spillage handling.

Etc.

Food Safety Team Leader Competency-
 Awareness training on BRCGS Global Standard for Food Safety Issue 9. by Intertek dated 18-19 Aug 2023.
 - Food Processing Sanitation Training Level -1 - University of Maine - Jan 20,2023

Competency of HACCP Team
 Competency of Internal Auditors - List of Internal Auditors with their competency 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.

Specific Regulatory Training/approvals - Certificates of Approval of Technologist meant to Handle Fish and Fishery Products for Export - 04 Technologists.
 Mr. AT - Technologist - MPEDA Training 4 days from 06-Dec-2022 for US Seafood Regulations 21 CFR Part 123 and cGMP (21 CFR Part 117) and Sanitation Control Procedures. Course also covers Govt of India, EU, and other international regulations relevant to processing and Export of Fish and Fishery Products
 Mr. P. B - Certificate of Training by EIA on Microbiological Testing, GOI Notifications, EIC EK, Instructions and Regulations of Importing Countries of Fish and Fishery Products verified for 021-Aug-2023

Other External Trainings



Laboratory Personnel have attended EIA Training on ELISA Lab and Method Validation for Antibiotic residues in Fish and Fishery Products Elisa Training from Kit Supplier Mizal Biovet for Three laboratory Personnel - in 2023.

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

Documented Personnel hygiene policy on CCCIII/DOC/68, Personnel hygiene practice was found satisfactory during audit site visit. Personnel, training is provided. Instructions are displayed at entry points.

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.

Daily Personnel hygiene log verified SSOP/PD/04

Verified for all the shifts.

Deviations are captured in the records and actions taken.

Hand swab of workers are being conducted on weekly basis.

Hand swab records verified. - Sanitary samples analysis register verified for the month of October: 30.10.2023, CCC-III/OPRP/QC/01, for food handlers is routinely done for parameters TPC and coliforms.

No jewellery is permitted to be worn inside; proper compliance was seen. Personnel with cuts or wounds are not allowed in open food area. Verification of the same is evident in the personal hygiene checklist. Use of medicine is controlled and monitored. Medicines not allowed inside the unit.

Persons with Wounds and cuts are not allowed in open food area. Metal detectable plasters not used.

7.3 Medical screening

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.

Company's 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 CCCIII/REC/62 before entering the production areas.

Employee Health Cards are available and updated during the audit.

Annual Medical screening is carried out for all food handlers. A procedure for Employee Health Condition documented.

Medical records as Health Cards for all workers are documented. Medical cards Certified by Dr. P. L.T - Reg # 97807

E.g., verified for SL - dated 15-09-2023. Antityphoid and paratyphoid vaccine has been give, dated 16.09.2023 Batch 19930c71c2.

Canteen chef - KS - dated 10-06-2022. Also, vaccination done on 16-04-2023.

All canteen workers were medically checked on 14-03-2023 in KIMS hospital including x-rays.

Vaccination is done to Food handlers on yearly basis.

Vaccination records available on Typhoid, cholera and tetanus.

Staffs working in all the process areas are covered.

7.4 Protective clothing: employees or visitors to production areas

Company has given protective clothing to all workers, and they need to wear it during work. Visitors and contractors are issued protective clothing before entry into the production facility.

02 pairs of protective cloths were provided, protective cloth is- apron, hairnet, head gear, gum boots and mouth mask.



Protective clothing design was adequate. High risk area is present in the facility. No high care areas in the facility. Different coloured and design work wears are provided at different process area. Nitrile gloves are disposed of after using or damage or torn, adequate monitoring was evident. Protective cloths are not used in toilet and cafeteria. Proper control was seen.

There is inhouse laundry for protective clothing of both high risk and low risk areas. Adequate segregation of protective clothing before and after washing is ensured.

No home laundry allowed.

Sanitary samples analysis register verified for the month of October: 30.10.2023, CCC-III/OPRP/QC/01 including Apron.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
7.2.3	The site does not use metal detectable plasters as injured personnel are not allowed to work inside processing areas
7.2.4	Metal Detectable plasters are not used



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8. Production risk zones – high risk, high care and ambient high care production risk zones

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

Verified Maps- The plant layout is marked with the Processing Unit Layout – Personnel Flow, Product Flow, Waste & packaging material movement (CCCIII/DOC/13) Unidirectional flow was evident for product, waste and utilities describing general layout, zoning, Access points, Company has site plan/several overlapping maps in which access points of personnel, raw materials and packaging; routes of travel for materials, equipment, people and waste material, production process flow, location of staff facilities is well defined.

Unit has decided the processing zone based on Appendix 2 guidance of BRCGS standard and classified as low risk, high risk, open product areas, enclosed area, Non – production areas.

Low risk areas – Receiving section, chill rooms, pre-processing section, processing section (grading and treatment), Raw IQF line and plate freezing line, cooking section (These are also open product areas). Area for handling packed products (including cooked products) and cold storage are also low risk as well as enclosed product areas. Low risk areas are physically well segregated from high risk areas.

High risk area- High Risk area (for handling cooked shrimp which is immediately chilled in a continuous operation in the IQF line) is completely separated. The partition between cooker and chiller is well designed without any gaps.

Non-product areas - Packing material stores - daily carton, carton store, Laboratory, office, machinery room, water treatment area, ETP, Changing rooms, rest rooms, etc.

Separate Food grade chemical storage and cleaning chemical storage is available. Working space is sufficient. Utensil normally cleaned at separated isolated areas with pocket door for transfer to the utensil storage areas. Washing and cleaning areas are adequately segregated from production areas.

Flow of drain water is from high risk to low risk areas The high risk areas observed to be maintained at high levels of hygiene and are adequately separated from other areas through physical segregation. Also practices are in place to minimize the risk of product contamination due to transfer points for materials, equipment, personnel and risk of contamination from air flow, and water flow through drains etc.

The filtered air pressure is managed inside the high-risk area. The entry is separated for low risk and high risk, change facility is dedicated. The change facility is provided with barrier, foot wash with 100 ppm and hand wash. Raw material entry and packing material entry is dedicated, no crisscross form Raw production area.

8.2 Building fabric in high-risk and high-care zones

High-risk area was found supplied with filtered air; specification of air circulation is available. Positive air pressure is maintained in the high-risk area of cooking process. Air microbiology is regularly checked (Weekly) and report was found satisfactory. The microbes tested are TPC for air count, The Utensil is tested for equipment for swab for the same Micro and the frequency is daily, or as and when processing is there. TPC, E. coli and Coliforms, VC, S. aureus and listeria for cooking section. Records verified dated: 02.11.2023. Results found satisfactory.

The entry is separated for low risk and high risk, change facility is dedicated. The change facility is provided with barrier, foot wash with 100 ppm and hand wash. Raw material entry and packing material entry is dedicated, no crisscross form Raw production area.

Verified maps of drains and physically inspected drains during audit. The flow of high-risk area drain start from IQF section and goes along with line of chiller, hardener and outside. The outside area is fitted with Non-returnable Valve.



The effectiveness of the ventilation system is checked by the use of periodic sampling of air microbiological quality. Verified records - Air microbiology is regularly checked and report was found satisfactory. The frequency is once in every production date, however with cooking area during the run. The Utensil is tested for equipment for swab daily, or as and when processing is done. TPC, E. coli and Coliforms, VC St aureus and Listeria are tested for cooking section and high-risk areas.

High risk area walls are strongly fitted. No temporary wall is present in the area.

Minor NC No. 6 Clause 8.2.2

Site provides Filtered Air to high-risk area where cooked products are handled. However, facility was unable to provide documentation related frequency of air changes and mechanism of confirming maintain a positive air pressure relative to the surrounding areas

8.3 Equipment and maintenance in high-risk and high-care zones

Tools for maintenance in high risk and high care zones are dedicated to these areas. Where specialist tools or equipment need to be brought into an area for a specific task, site has mechanisms in place to ensure that this does not result in contamination (e.g. cleaning equipment before entry and post-maintenance cleaning of the high-risk)

Hand-held device like thermometer, metal detector and hand held trolleys are dedicated to high risk area only.

8.4 Staff facilities for high-risk and high-care zones

The changing facilities incorporate - Clear dress changing instruction provided at high risk area. Protective clothing is found to be one set of overalls in white colour. This is for one time use only.

Clear hand washing instruction to prevent contamination of protective wear. The sequence of hand washing along with dress changing sequences was observed during second day production of cooked product.

The hand gloves are dedicated used, changed on the daily basis. Change facility is separated from low risk for high risk area

Foot wear control is by - the use of cross over bench. Change room facility was founded properly designed for high-risk area, feet washing, and sanitation dip was available after wearing dedicated shoe before entering to high-risk area with hand washing and sanitation facility. Street shoes are removed before entering to change room facility to avoid contamination.

The environmental monitoring plan includes testing of swabs from boots and also floor of high risk areas for pathogens. Verified - sampling plan and records

8.5 Housekeeping and hygiene in the high-risk high-care zones

High risk area cleaning procedure was documented in Master Cleaning and Sanitation Schedules (BSM/07 Dated 26.03.2023) and reviewed Pre-Operational Checklist for Cooking Line verified, complies.

Pre-Operative & Workers -Hygiene Checklist, Doc No. SSOP/PD/04, dated: 01.11.2023, & 02.11.2023, Day Code: 3L01, A Shift, High Risk Zones covered for the Line Chlorination,

Hygiene & Sanitation Record, Doc No. FMT/SSOP/04, dated: 02.10.2023, Cooking IQF Areas, Utensils, Packing Areas, Cist Shell Waste Room, CIST Room, Cold Storage Area, DPMS Area, covered for the no. of workers allotted and complies. Through cleaning is done every day after completion of production for process area equipment with soap solution, sanitization with 50-100 ppm chlorine and then rinse with running water for food contact surface. Water jet is used to remove physical dirt from IQF belt. Hand wash is 20 ppm Micro swab is taken daily for different operation areas. Micro results are reviewed for the month of January 2023 to October 2023. High risk area cleaning equipment are separately color coded and



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dedicated cleaning staff appointed for this zone. Listeria is tested on 05.05.2023, for cooking area. Visual inspection is carried out by the QA during the production. Personnel hygiene checklist for High Risk done verified for January 2023 to October 2023. FMT/SSOP/178.

Monthly fabrication & Hygiene Inspection Audit, Doc No. CCCIII/REC/33, Issue No.& date: 01.04.2023, covered for 12 areas in high risk and found complies.

Environmental monitoring program, Doc No. CCCIII/EMP/01, Issue No.1.0 & 01.04.2023, Revision no.00, dated: 00/00, Zone 1: Direct/ Indirect Product Contact, Zone 2: Areas adjacent to the Zone 1 Sites, and Zone 3: Non-Product contact within protected areas, Zone 4: Outside protected areas, potential targets: Aerobic Plate Count, Coliforms, Yeast & Molds, Salmonella, Listeria, S. aureus, V. Cholerae. Test timings: Pre-Operation: After Sanitation but the before start of the production, Pre-Operation: After sanitation but before start of production, at least 3 hours into production shift, and At least 3 hours into production shift. Frequency of the testing: monthly.

Sanitary samples analysis register verified for the month of October: 30.10.2023, CCC-III/OPRP/QC/01, Water in High Risk & Low, Ice High Risk & Low risk, Green Box, Conveyor Belt, Workers Hands, Packing Area, Apron, Air, PPC Swabs, NFCs: Drainage Alfa I, & Waste Bins, targeted for the TPC, Coliforms, Coliforms, Vibrio, S. aureus, and Listeria and found to be complies.

Through cleaning is done every day after completion of production for process area equipment with soap solution, sanitization with 50-100 ppm chlorine and then rinse with running water for food contact surface. Water jet is used to remove physical dirt from IQF belt. Hand wash is 50 ppm Micro swab is taken daily for different operation areas. Micro results are reviewed for the month of September & October 2023. High risk area cleaning equipment are separately color coded and dedicated cleaning staff appointed for this zone. Listeria is tested on 30.10.2023, for cooking area. Visual inspection is carried out by the QA during the production.

8.6 Waste/Waste disposal in high risk, high care zones

Waste generation in High-Risk area is negligible. Colour coded Waste bins used in High-Risk area. Wastewater flows directly to ETP. Risk Assessment of Waste flow and found effective.

8.7 Protective clothing in the high-risk high-care zones

Company has given protective clothing to all workers, and they need to wear it during work. Visitors and contractors are issued protective clothing before entry into the production facility. 2 pairs of protective cloths were provided, protective cloth is- over coat, apron, cap, mouth mask, cover footwear (PVC shoe). Dedicated uniforms & Dedicated shoes are provided in respective area. Daily Changing of Uniforms evidenced in High-risk area and ensures by the laundry Register. Policy is documented. In the internal audit Laundry is area is done. Laundry is internal. Reports verified. Proper control was evident. Swab test is conducted for uniforms on daily basis - Swab is tested - report verified dated 29.10.2023 & 30.10.2023

Minor NC # 7 Clause 8.7.1

Inhouse laundry in place. High risk clothing is laundered in hot water, however the minimum temperature for laundering of high-risk protective clothing has not been defined in the SOP for Laundry CCCIII/SSOP/47

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

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, E-mail globalbrc@sgs.com

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CB Report No. IN/F/B/964138

Auditor: Ja [REDACTED]



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9. Requirements for traded products	
9.1 The food safety plan - HACCP	
Not applicable	
9.2 Approval and performance monitoring of manufacturers/packers of traded food products	
Not applicable	
9.3 Specifications	
Not applicable	
9.4 Product inspection and laboratory testing	
Not applicable	
9.5 Product legality	
Not applicable	
9.6 Traceability	
Not applicable	

Module 11: Meat Supply Chain Assurance	
Scope	Click or tap here to enter text.
11.1 Traceability	
Click or tap here to enter text.	
11.2 Approval of meat supply chain	
Click or tap here to enter text.	
11.3 Raw material receipt and inspection	



Click or tap here to enter text.

11.4 Management of cross-contamination between species

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11.5 Product testing

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11.6 Training

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Module 13: Meeting FSMA Requirements for Food – July 2022

Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)

Click or tap here to enter text.

Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)

Click or tap here to enter text.

Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)

Click or tap here to enter text.

Sanitary Transportation: 21 CFR Part 1 Subpart O (Clauses 13.4.1 – 13.4.9)

Click or tap here to enter text.

Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

Click or tap here to enter text.



14.1 Additional Specifier Requirements

14.1 Traceability

Click or tap here to enter text.

14.2 Environmental Monitoring

Click or tap here to enter text.

14.3 Product inspection and laboratory testing

Click or tap here to enter text.

14.4 Protective clothing: Employees or visitors to production areas

Click or tap here to enter text.

