

2 The Food Safety Plan – HACCP

The company has a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles.

The HACCP team is multidisciplinary and site specific. In Moordrecht the team consists of the plant manager, the local quality responsible (chair), the production leaders, the planner and head maintenance department and the members have specific and relevant knowledge. The team leader is qualified through in- and external training and experience in the food industry. When necessary the central QA department is consulted.

The HACCP plan includes raw materials, packaging materials, and finished product groups (caramel filled wafers for Moordrecht). The process starts with call-off of raw materials which are stored on site, weighed, mixed and cooked (caramel syrup), followed by forming and baking, optionally coating with chocolate, packing and storing at the (outsourced) distribution center.

The prerequisite programmes are established. The control measures and monitoring procedures are clearly documented.

Following product group(s) are defined: wafers filled with caramel (syrup), optionally coated or decorated with chocolate and/or sprinkles. All products are baked and have low Aw value (0.3-0.5) making it ambient stable end products. For all wafers it is advised to store cool (<25°C) since the chocolate and caramel can melt.

All products are suitable for general use, with exception of babies and persons suffering from allergies for one or more of the ingredients.

The overall flow diagram is split in several parts: a diagram incoming goods, a diagram for production of caramel wafers, a diagram for production of chocolated caramel wafers, a diagram for packaging, and a diagram for the dispatch. The main steps are weighing, mixing, cooking, forming, baking, cooling, coating/decorating, cooling and packing.

The accuracy of the flow diagrams is verified on-site every year. Seen last change and verification dated 2020-12-16.

Potential hazards for the processes are identified. Physical, chemical, microbiological and allergen hazards are considered. Significant hazards are for example cross contamination with allergen containing materials, presence of salmonella in the chocolate and contamination with foreign bodies.

Head Office Audit: Potential hazards for raw materials are identified. Physical, chemical, microbiological and allergen hazards are considered. Significant hazards are for example cross contamination with allergen containing materials, presence of salmonella in the chocolate and contamination with foreign bodies. The hazard analyses is conducted for all raw materials. The likelihood (0 0.5 1 2 3 4 5) and effect (2 4 50 80 100) are assessed based on experience, literature, legislation and practical values. If the risk (likelihood x effect) is <50 no control measure is required, the risk is controlled through the prerequisite program. If the risk ≥ 50 the risk is potentially unacceptable and a control measure needs to be defined (which can be in the form of a prerequisite). With a decision tree it is determined whether the control measure is a PVA or a CCP, or does not need specific monitoring because it is not the last step in the process to reduce or prevent the risk. The risk analysis for the raw materials and packaging is described in HCP-S-05 dated 2020-02-11 and includes the assessment of food fraude. The raw material assessment is based on the Risk Plaza system and made with the help of an external consultant.

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The raw materials hazard analysis is general for all sites, the processes are done local with the same system, for Moordrecht described in HCP-S-06 dated 2020-07-10. Hazard analysis verified for the product from trail.

The necessary control measures to prevent, eliminate a food safety hazard or reduce it to an acceptable level are considered. Verified for the product of the trail.

The applied method for determining CCP's is by decision tree and risk matrix. The company determined 1 CCP, metal detection.

Head Office: The hazard analysis for raw materials and packaging materials is done centrally, processes are assessed at the sites. The hazard analysis for raw materials is documented in HCP-S-05 and includes the assessment of food fraude. The raw material assessment is based on the Risk Plaza system and made with the help of an external consultant. For some raw materials the risk analyses requires testing of certain contaminants in the raw material like DON in flour and Salmonella in chocolate. The required analyses are divided over the different sites. Moordrecht: Critical limits are set to identify whether the process is out of control. The critical limits are measurable and supported by clear guidance, limits are 1.5 mm Fe, 2,0 mm Non-Fe and 2,4 mm SS.

The CCP is validated based on a study on size of foreign matter, published in literature and by the Dutch VWA indicating a 7 mm. limit for healthy adults and 2 mm. limit for young children and vulnerable consumers.

The operation of the metal detector is checked at start up of a product, every hour and at end of production.

Records are verified by the head of production who performs 4 compliance rounds per shift and signs off the registration form.

The corrective action plan is defined for each CCP. In case the metal detector test fails, the product produced after the last successful test is put on hold and the metal detector is checked (and repaired if required). The blocked products are re-tested.

Seen the last verification of the Head office, dated February 2020. Moordrecht: The results of the verification are recorded 2020-12-16 and are communicated to the HACCP food safety team. The verification included e.g. the following activities: internal audits, complaints and CCP-measurements.

The HACCP system verification is carried out together with the management review. It is prepared by the plant manager and the QA/QC employee and includes all relevant subjects like audit results, CCP monitoring records, complaints analyses, pest control inspections, factory inspections on hygiene, brittle matter and construction etc. Last review was present as concept of 2020 dated 2020-12-16, this will be discussed at the end of January 2021.

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