Bureau Veritas Certification

Bureau Veritas Certification Holding SAS – UK Branch certifies that, having conducted an audit

At

VINH HOAN CORPORATION

BRC site code no: 4216061

Audit site address:

30 National Road, Ward 11, Cao Lanh City, Dong Thap Province, Vietnam

For the scope of activities:	**Production (slaughter, filleting, skinning, glazing or not) and packing of raw frozen (plain or marinated) or coated and pre-fried frozen Pangasius in plastic bags and outer carton. Production (slaughter, filleting, skinning, glazing) and packing of raw frozen Barramundi in plastic bags and outer carton.**
Exclusions from scope:	**None**
Product categories:	**04 - Raw fish products & preparations, 08 - Cooked meat/fish products**
Has achieved Grade:	**A**

Meets the requirements set out in the

Global Standard for Food Safety

Issue 8: August 2018

Audit Programme:	**Remote**
Date(s) of the audit:	**24/25/26-02-2021**
Auditor Number:	**21967**
Re-audit Due Date:	**From 05-02-2022 To 05-03-2022**
Certificate Expiry Date:	**16-04-2022**

Certificate No.: **VN007933** Issue Date: **07-04-2021**

Check the validity of this certificate on BRC homepage: www.brcdirectory.com

UKAS PRODUCT CERTIFICATION

0008

BRCGS Food Safety CERTIFICATED

Signed on behalf of BVCH SAS UK Branch

Certification Body Address: 5th Floor, 66 Prescot Street, London, E1 8HG, United Kingdom

Managing Office: Unit 4.4A, 4th Floor, E-Town 1 Building, 364 Cong Hoa Street, Tan Binh District, Ho Chi Minh City, Vietnam

If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

Audit Report

1.Audit Summary			
Company name	VINH HOAN CORPORATION	Site Code	4216061
Site name	VINH HOAN CORPORATION		
Scope of audit	Production (slaughter, filleting, skinning, glazing or not) and packing of raw frozen (plain or marinated) or coated and pre-fried frozen Pangasius in plastic bags and outer carton. Production (slaughter, filleting, skinning, glazing) and packing of raw frozen Barramundi in plastic bags and outer carton.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Start Date	2021-02-24	Audit Finish Date	2021-02-26
Re-audit due date	2022-03-05	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 type	Remote
Previous audit grade	A	Previous audit date	2020-02-24		
Certificate issue date	2021-04-07	Certificate expiry date	2022-04-16		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

3.Company Details

Address	30 National Road, Ward 11, Cao Lanh City, Dong Thap Province		
Country	Vietnam	Site Telephone Number	+84.0277.3891166
Commercial representative Name	Truong Thi Le Khanh / Chairwoman	Email	lekhanh@vinhhoan.com
Technical representative Name	Le Thi Dieu Thi / Quality Director	Email	dieuthi@vinhhoan.com

4.Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	>1500	No. of HACCP plans	1-3

Shift Pattern	Working 1 shift [redacted]
Subcontracted processes	No
Other certificates held	ISO 22000, ISO 9001, ISO 14001, IFS Food
Regions exported to	North America Europe Asia Oceania Choose a region Choose a region
Company registration number	None
Major changes since last BRCGS audit	None

Vinh Hoan Corporation was built in 1997 to produce and export frozen raw and pre-fried breaded pangasius with 18,000 m2 constructed (site area). The site located at Dong Thap province and head office was located in the same area.
- Factory EU Code: DL61, DL147 and DL500.
Capacity is approximate 400 MT of raw materials/ day. There was no seasonal break. No trade product
- The last investment was repaired and maintenance the building & equipment is around 1.5 Mil USD.
- Emergency contact person is Ms. Le Thi Dieu Thi, e-mail address: dieuthi@vinhhoan.com.vn, telephone (+84) 908 507 058

4.Company Profile

- Main product types are frozen raw fish and some pre-fried breaded & marinate fish. There are 3 workshops [redacted].
- Key process: Receiving raw materials – Bleeding – Washing 1– Fillet – Washing 2 – Skinning – Trimming – Checking bone& parasite - Washing 3 - Soaking (option step) – Sizing grading – Washing 4 – pre-freezing – freezing/glazing – PE packing – metal detection - packing carton – storage – dispatching. Further processing step of Pre-fried breaded products: Semi product -washing - coating - mixing with additives (premix-wheat flour) - pre-frying- cooling - freezing - weighing - PE packing - carton packing - storage - dispatching.
- No Seasonal breaks.
- No subsidiary.
- Most products are for export to Europe, USA, and Asia market. There is no use of BRCGS logo.
- The company has been certificated to ISO 9001, ISO 14001, HACCP, BRCGS Food, IFS Food, Global GAP, BAP, ASC.
- This is full remote audit 100% duration time and Microsoft team has been used in carrying out the audit and the effectiveness of ICT in achieved the audit objectives.

5.Product Characteristics

Product categories	04 - Raw fish products & preparations 08 - Cooked meat/fish products Category Category
Finished product safety rationale	Raw or pre-fried product and fully cooked by consumption; frozen storage < -18 degree C, shelf-life 2 years

High care	No	High risk	No	Ambient high care	No

Justification for area	Product is raw or pre-fried before packing and not ready to eat as per BRC Decision tree
Allergens handled on site	Fish Cereals containing gluten
Product claims made e.g. IP, organic	None
Product recalls in last 12 Months	No
Products in production at the time of the audit	Frozen raw pangasius

6.Audit Duration Details			
On-site duration	32 man hours	Duration of production facility inspection	16 man hours
Reasons for deviation from typical or expected audit duration	No deviation		
Next audit type selected	Announced		

Audit Duration per day			
Audit Day	Date	Start Time	Finish time
1	2021-02-24	08:30	17:30
2	2021-02-25	08:30	17:30
3	2021-02-26	08:30	17:30

	Auditor number	Name	Role
Auditor Number	21967	Hau Vo Trung	Lead Auditor
Second Auditor Number	21261	Tu Bac Chung (day 3)	Auditor

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
Huynh Thi Hong Diem – Production Vice Director	X		X	X
Nguyen Thi Phuong Uyen – QA Vice manager	X	x	X	X
Pham My Phuong – Lab manager	X		X	X
Nguyen Hoa Minh – Warehouse	X		X	X
Van Thi Thao – Plant 2 Manager	X		X	X
Nguyen Thi Ly – Plant 3 Manager	X		X	X
Truong Thi Be Ut – Plant Manager 1	X		X	X

Ho Thi Nhu Nguyet – HR/Admin Manager	X		X	X

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
2020-02-24	BRCGS Food Issue 8	Announced

Non-Conformity Summary Sheet

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

Critical			
No.	Clause	Detail	Ant. Re-audit date

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

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	2.5.1	Verified flow diagram during the audit and found that flow diagram not accurate for product breaded fish and marinated fish: - Predust powder breading step was not mentioned in flow chart - Packing step for marinated fish after freezing step is not accurate compared with actual situation	- Add predust power breading step in flow chart. - Update packing step for marinated fish accurate compared with actual situation.	- Guide QA staff to update flow chart in time. - Recheck all flow chart of products to update in time.	QA staff did not update flow chart in time.	2021-03-16	Hau Vo
2	2.7.2	The factory has a documented instruction for hazard analysis however it was not followed consistently for HACCP studies	Update hazard analysis followed consistently for HACCP studies.	- Guide QA staff to make hazard analysis followed consistently for HACCP studies. - Recheck all hazard analysis of products to update in time.	QA staff makes hazard analysis not followed as guiding.	2021-03-16	Hau Vo

Minor							
3	3.4.1	Internal audit program was established for year 2021. However, it was not based on result of risk assessment	Make a risk assessment to determine frequency of internal audit.	- Note in the procedure of internal audit must risk assessment to determine frequency of internal audit. - Trained about the procedue of the updated internal audit.	Not yet risk assessment to determine frequency of internal audit.	2021-03-16	Hau Vo
4	3.4.2	Checked internal audit plan done on Jan-2021 and found Quality staff was arranged in internal auditor group audited in Quality department.	Make internal audit for Quality department does not have Quality staff.	- Guide QA staff to make internal audit plan. - Recheck the other internal audit plan to ensure in accordance with the internal auditor's requirements.	QA staff makes internal audit plan is not in accordance with the regulation in procedure.	2021-03-16	Hau Vo
5	3.5.2.1	Checked CoA of PA additives lot no. 10820 from supplier Fish & Tech and found that heavy metal Pb = 10 ppm exceeding limit defined in specification TC04/2010/VH, dated 02-Jan-2020	Update the specification with limit of Pb = 10 ppm.	- Guide QA staff to update the additives specification in time. - Recheck the other additives specification to ensure in accordance with CoA.	QA staff does not carefully check the limit of parameters in CoA with specification to update in time.	2021-03-16	Hau Vo

Minor							
6	3.6.1	Specification of potato powder was not defined and approved adequately by factory	Make the specification of potato powder and approved adequately by the board of Director.	- Guide QA staff must make specification adequately for materials. - Check all material specifications compared with list of approved suppliers.	QA staff is missed potato powder material, not making the specification in time.	2021-03-16	Hau Vo
7	5.4.2	Vulnerability risk assessment for all raw material and packaging materials dated 05-Jan-2020 thus not yet reviewed annually	Make vulnerability risk assessment for all raw material and packaging materials for 2021 year.	- Guide QA staff must review document annually. - Recheck all documents in company to review in time.	QA staff does not know the regulation must review documents annually.	2021-03-16	Hau Vo
8	6.4.3	According to the calibration procedure dated 1.8.2018 mention use the standard calibration device thermometer code NK- S05 however in the practice, the thermometer used code NK – 305, this device NK - 305 is calibrated, there is no possible trace back to device NK – S05	Update the calibration procedure use the standard calibration divice thermometer code NK-305.	- Guide QA staff to update procedure when has changing.	QA staff is not updated the procedure in time.	2021-03-16	Hau Vo
9	7.1.5	Checked training records done in year 2020 and found	Add the duration in the training records.	- Note in the procedure of human resources, the training records	Not regulation yet the	2021-03-16	Hau Vo

Minor							
		it did not mention duration of training		must have the duration. - Trained about the procedure of human resources.	training records must have the duration so classroom tracking staff did not written them fully.		

Comments on non-conformities
None

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit due date

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

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

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The Corporation Director and managers showed strong commitment through the strong technical team and investments in the facility. The food safety and quality policy was reviewed on 02-Jan-2019 commits to provide quality, safety, legality compliant product, in compliance with destination market and Vietnam market, duty to customers is satisfaction for delivery, quality, and price, protect environmental and provide good working environment. The policy was signed by General Director Nguyen Ngo Vi Tam.
The policy was available and communicated to all staffs by posting areas and training, reviewed during the management review. The quality policy which is also aim of the management to build a culture for the whole company, management team encourage staff to aware, understand the business of the company, the vision, two way communication are established in the site, staff evaluation & goal setting are established & implemented, the management encourage a team work environment, commit to provide a training for those needs, the quality & food safety culture are defined as long program, from time to time build an awareness to staff. Culture development program is established and documented in [redacted] procedure and will be reviewed annually.
Objective for 2021 were established for company & each department for each quarter, approved by Director, dated 23-Jan-2021 and detailed action plan to achieve & review objectives every three months, have reviewed some objectives:

- No food safety issue relating to micro contamination, chemical hazard
- Reduce customer complaint < 1%
- 100% equipment maintained according to plan

Review result of objectives 2020: all objectives archived.
Management review meetings are conducted quarterly. [redacted] Minutes of the management review meeting have been maintained properly. Management review inputs have included the company policy and objectives, customer complaints and customer satisfaction, non-conformities, corrective action, incident, audits result (internal audit and external audit), HACCP review, production figures and resources needed.
Weekly and monthly meetings related to food safety, legality and quality issues are conducted properly such as meeting on that discussed issues relating to production targets [redacted]. Deputy General Director as top management has provided adequate resources and support for systems compliant to the BRC standard, including GMP facilities, competent employees, issued company food safety police and objectives, relevant documentations and records etc. Senior management commitment and continual improvement was observed.
QA department is responsible for updating the relevant laws and regulations and make sure updated timely. Company has copy of BRCGS Food Issue 8. The used of BRC logo was observed and verified that it is according to the requirement. The most senior production and operations manager on site attended the opening and closing meetings of the audit for Global Standard for Food Safety certification. Relevant departmental managers were also available during the audit process.
List of applicable legislation was viewed, mainly documents updated by NAFIQAD (competent authority) & supporting to seafood factory, the company also update regulation of EU country through the group, list of EU legislation also was available.
Any person can report any issue related to product quality, safety & legality, there is a system in place to report to the management team by telephone, mailbox for all workers can report any issues.
All non-conformities of previous BRC audit have been effectively addressed.

1.2 Organisational structure, responsibilities and management authority

The organization chart approved in quality manual was in place and communicated to all workers via communication boards. The job duties, qualification, and deputation for all work positions were clearly defined in the correspondence job description. Management team worked together with their staffs to solve any raised problems. Deputies were clearly documented in organization and HACCP functional regulation. Quality manager is responsible to control all non-conformities identified internally and externally and she is responsible to ensure all CARs completed effectively.
Experienced management team headed by the Director includes supervisors reporting to the Production Manager, Technical Manager, Hygiene Manager, QA Manager. Finance, Sales and Human Resource Directors also report to the Managing Director. It was clearly documented the deputizes in the absence of the responsible person in organization chart.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
1.1.13	No BRCGS logo used

2 The Food Safety Plan – HACCP

HACCP team established to manage food safety for individual processing plant and include head of department of QA/QC, production, maintenance, warehouse
Decided HACCP team for workshop 1, dated 15-Sept-2020 with 11 members. A point Ms Nguyen Thanh Lan – QM Manager is team leader – more than 10 experienced years in seafood processing.
Decided HACCP team for workshop 2, dated 15-Sept-2020 with 11 members. A point Ms Nguyen Thanh Lan – QM Manager is team leader – more than 10 experienced years in seafood processing.
Decided HACCP team for workshop 3, dated 15-Sept-2020 with 11 members. A point Ms Nguyen Thanh Lan – QM Manager is team leader – more than 10 experienced years in seafood processing.
All members of HACCP team were trained in HACCP, ISO 2200 by NAFIQAD, VASEP and Consultant Co., Ltd.
PRP procedure established to control hygiene and processing environment condition
SSOP 01: Water safety [redacted].
SSOP 02: Food contact surface [redacted]
SSOP 03: Preventing cross-contamination [redacted]
SSOP 04: Personal hygiene[redacted]
SSOP 05 Packaging & labelling[redacted]
SSOP 06 Preventing cross-contamination[redacted]
SSOP 07: Chemical control[redacted]
SSOP 08: Personal health[redacted]
SSOP 09: Pest control[redacted]
SSOP 10: Handling waste[redacted]
SSOP 11: Control Glass-hard plastic[redacted]
There are 4 product plans within the 3 HACCP plans defined in scope of audit.

HACCP Plan of frozen fillet fish [redacted]21
Product description:
- RM: fish, additive (phosphate, non phosphate), water, ice
- Allergen: pangasius fish, baramundi fish
- PM: plastic pack (contact to food is PE layer), carton (second packaging)
- Packed in 5 kgs/block, 2 block/carton
- Shelf life: 24 months
- Stored < - 18 degree C
- Intended use: fully cook before use

Flow chart: Raw fish– Washing 1 – Slaughtering - Filleting – Washing 2 – Skinning (lạng da) – Checking Parasite – Color/size classifying – Additive adding (if any) – Color/size classifying – Weighing – Block/IQF (cấp đông) – Glazing (tách khuôn, mạ băng, rã đông) – Weighing - Packaging – Metal Detecting – Packing – Cold WH.

Flow chart [redacted]

Hazard analysis is included in HACCP studies, potential hazards are identified in raw material such as antibiotic, heavy metal, mycotoxin, pathogens, allergens, foreign bodies, malicious contamination of products and in processes due to cross contamination.

Method of risk analysis is defined in HACCP plan

Likelihood of potential hazard has 5 levels: 1: very low, 2, low, 3: medium, 4: high, 5 very high

Severity of potential hazard has 5 levels: 1 very low, 2, low, 3: medium, 4: high, 5 very high

Significant hazard is determined based on likelihood vs severity more than 8 scores.

Significant hazard is controlled ORPP or CCP. Decision tree is used to categorize CCP and OPRP

Non-significant hazard is controlled by PRP.

CCP 1: Receiving RM (fish), significant hazard is Antibiotic (Nitrofuran, Enrofloxacin, Difloxacin…)/ Pesticide (DDT, Aldrin, Chlorpyrifos…)/ heavy metal (Cd, Pb, As, Hg)/ Total Aflatoxin B1B2G1G2, control measure is commitment letter from supplier/check CO/Testing report, critical limit based on local NAFIQAD, monitoring by check every incoming lot.

CCP2: Parasite inspection: control parasite by inspecting 100% product and QC random checking hourly.

CCP3: Step Metal Detecting, hazard is metal, control measure by test metal detector, critical limit is Fe =1.5 mm/ SS = 2.5mm/ Non Fe = 2mm, monitoring => check Metal Detector 1 time/1hr, beginning of shift, end of shift

+ CCP4: Packaging: control allergen (fish) and control measure is check allergen information of packaging, critical limit is full allergen information of packaging, monitoring by check beginning of production lot & 1 time/hour.

HACCP plan for PRE-FRIED BREADED PANGASIUS

Product description:
- RM: fish (semi product), salt, additive (phosphate, non phosphate), Predust powder, Battermix powder, cooking oil
- Allergen: fish, wheat gluten
- PM: plastic pack (contact to food is PE layer), carton (second packaging)
- Stored < - 18 degree C
- Intended use: fully cook before use
- FGs characteristics: appearance, size, weight, heavy metal (Cd, Pb, As, Hg), Total Aflatoxin B1B2G1G2, Pesticide (DDT, Aldrin, Chlorpyrifos…), Antibiotic (Nitrofuran, Enrofloxacin, Difloxacin…), Microorganism (Vibrio cholera, TPC, Salmonella, Coliforms, E.Coli, S.coagulase, Listeria monocytogenes).

Main Process flow chart: PRE-FRIED BREADED PANGASIUS: RM (Semi product of fish/ Battermix powder/Spice/Predust powder/Crumbs) – Glazing - predust => breading – Pre-frying– Cooling - Freezing – Weighing – Packaging – Metal Detecting – Packing – Cold WH

Hazards were identified in raw material and packaging material, cross contamination from machine/equipment/environment/people in processes such as:
- Physical hazards: foreign matter such as hair, metal, insect, dust due to poor hygiene from people and production environment.
- Chemical hazards: migration of packaging, pesticide/heavy metal/antibiotic in RM & PM.

- Micro-organism hazards: parasite, pathogens in RM and due to cross contamination.

HACCP Plan[redacted]

+ CCP 1: Receiving raw material: control chemical hazard (aflatoxin, pesticide residue, heavy metal) by checking declaration & testing report incoming lot by QC staff.
+ CCP2: Step Packaging, allergen (fish, wheat gluten), control measure => check allergen information of packaging, critical limit -> full allergen information of packaging, monitoring => check beginning of production lot & 1 time/h
+ CCP3: Metal detecting, hazard => metal, control measure => Metal Detector, critical limit => Fe =1.5 mm/ SS = 2.5mm/ Non Fe = 2mm, monitoring => check Metal Detector 1 time/1hr, beginning of shift, end of shift.

HACCP plan for FROZEN MARINATED FILLET PANGASIUS

Product description:

- RM: pangasisu fish, refined soya oil, vegetable, salt, sugar, spice powder, mustard, additive (phosphate, non phosphate), water, ice
- Allergen: fish, wheat gluten, mustard
- PM: plastic pack (contact to food is PE layer), carton (second packaging)
- FGs characteristics: appearance, size, weight, heavy metal (Cd, Pb, As, Hg), Total Aflatoxin B1B2G1G2, Pesticide (DDT, Aldrin, Chlorpyrifos…), Antibiotic (Nitrofuran, Enrofloxacin, Difloxacin…), Microorganism (Vibrio cholera, TPC, Salmonella, Coliforms, E.Coli, S.coagulase, Listeria monocytogenes)
- Shelf life: 24 months
- Intended use: fully cook before use
- Storage condition: -18 dgree C
- Distribution: by cold truck/ container -18 degree C

Main Process flow chart - FROZEN MARINATED FILLET PANGASIUS: RM (Semi product of fish/ Vegetable/Spice) – Glazing - Washing – Processing (chế biến) – Marinating – Freezing – Weighing – Packaging – Metal Detecting – Packing – Cold WH.

Hazards were identified in RM, PM, cross contamination from machine/equipment/environment/people in processes such as:

- Physical hazards: FB, hair, metal, insect, dust due to poor hygiene from people and production environment.
- Chemical hazards: migration of packaging, pesticide/heavy metal/antibiotic in RM & PM.
- Micro-organism hazards: parasite, pathogens in RM and due to cross contamination.

* HACCP Plan[redacted]

+ CCP 1: RM (fish), hazard => Antibiotic (Nitrofuran, Enrofloxacin, Difloxacin…)/ Pesticide (DDT, Aldrin, Chlorpyrifos…)/ heavy metal (Cd, Pb, As, Hg)/ Total Aflatoxin B1B2G1G2, control measure -> commitment letter from supplier/check CO/Testing report, critical limit -> as spec Nafiqad, monitoring => check every incoming lot.
+ CCP 2: Step RM: hazard is Pesticide (Cartap, Aldrin, Chlorpyrifos…), control measure = by check testing report, monitoring => 1 time/year
+ CCP 3: Step Packaging, allergen (fish, wheat gluten, mustard), control measure => check allergen information of packaging, critical limit is full allergen information of packaging, monitoring -> check beginning of production lot & 1 time/hour
+ CCP 4: Metal Detecting, hazard => metal, control measure => Metal Detector, critical limit is Fe =1.5 mm/ SS = 2.5mm/ Non Fe = 2mm, monitoring => check Metal Detector 1 time/1hr, beginning of shift, end of shift.

Verification HACCP system plan (KH01/QT19) annually and approved 02-Jan-2020

Verification HACCP System including flow diagram, product description, hazard analysis, GMP/SSOP, CCP is planned at least annually and the last verification report done on 29-Dec-2020

Verify CCP performed annually and verification minutes CCP seen for 3 workshops done on 29-Dec-2020 and all CCPs under good control.

NC2.5.1, 2.7.2

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
None	

3. Food safety and quality management system

3.1 Food safety and quality manual

Company manual consists of quality management system manual revision [redacted]. The manual is available to selected HACCP team and management as seen on the document distribution list. The company's manual is fully implemented by staffs. Documents are clearly legible, unambiguous and sufficiently detailed. They are readily accessible to relevant staff at all times. Photographs are used for some instructions such as hand washing, instruction of wearing uniform, product specification that is using in processing area.

3.2 Document Control

Document control procedure [redacted] was established to control document. Version number, effective dated, document author & approved by assigned people, control obsolete product by stamp, master list of document & distribution list of documents [redacted]. The reason for any changes or amendments to documents which are part of food safety and quality system is recorded

3.3 Record completion and maintenance

All records related product and process performances retained in 3 years (2 years of shelf life plus one year) as mentioned in quality manual/ record control procedure [redacted]. Record in hard copy & also in electronic format, back up record daily. Records seen were legible and the correct version

3.4 Internal audits

Follow Internal Audit Procedure [redacted]. Internal audit was planned and conducted throughout the year [redacted] to be based on the risk assessment, verified [redacted] in all department. The audit confirmed by check list, 2 groups of auditors are arranged. The internal auditors are trained skill internal audit internally by Huynh Thi Hong Diem [redacted], training content with preparation of master audit program, individual audit plan, note, checklist use, report of nonconformity, according to internal audit procedure, the audit is not allowed to audit their work.

There are some minor nonconformities found in the internal audit. The nonconformity is defined with root cause and time scale for corrective actions, up to now, all NCs found during internal audits were fixed. Corrective actions was completed and effectiveness checked, the report CAP was seen, the audit checklist used with record of finding.

Audit reports are communicated to heads of departments after finishing the audit, record of nonconformities are reported to the audited department head, root cause, corrections, corrective actions are submitted in timeframe.

Monthly inspections in production record [redacted] have been verified covering fabrics, utilities & equipment.

[redacted]

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

All materials bought into site which form part of the final product including fresh raw fish, ingredient and additives and packaging materials are sourced through approved suppliers and are monitored annually.
Risk assessment for raw materials and packaging is implemented and included microbiology, chemical contamination, allergens, foreign bodies, fraud is included in HACCP plan and document [redacted] and is reviewed annually.
Purchasing and selecting, evaluate supplier followed procedure Purchasing process [redacted]
Suppliers are evaluated once per year, high risk suppliers are evaluated on-site, low risk suppliers are evaluated by questionnaire.
List of approved raw materials and packaging suppliers is in place[redacted]
For example, checked supplier evaluation of [redacted], supplier assessment report about: location / infrastructure/ light system / handling waste/ equipment/ personal hygiene/ transportation/pest control/ quality management / traceability/ chemical control, total score = 80/100 and found compliantly.
Checked supplier [redacted] providing potato powder and evaluated offsite by questionnaire [redacted]
For agents and brokers, information related to traceability and GFSI certificates from manufacturer is supplied to the site by brokers.
No supplier approval exceptions are allowed in the supplier evaluation procedure.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

All raw materials and packaging are checked against specification and approved for compliance by QC before release to production.
For example, auditor Monitoring of raw fish pangasius receiving and inspection report [redacted]a
Incoming inspection report [redacted]

3.5.3 Management of suppliers of services

Suppliers of services used are such as testing, waste management, calibration, pest control, transportation, etc. Suppliers of services control followed the procedure [redacted].
These services providers were selected and evaluated separately for specific criteria such as business licence, competence profile, price and prestige. Services specifications/contracts were in place with details covering requirements of the plant in food safety, environment and other aspects. Selecting evidence and services providers' performance monitoring reports were maintained for each service provider.
Checked service supplier of Testing – Intertek, NAFQAD: evaluated performance done on 10-Dec-2020 and evaluation report seen: detail for Quality – scope of accredited ISO 17025 – Specialize – Service: total 90 points. Checked pest control service supplier of VFC Can Tho evaluated performance done on 12-Dec-2020 and evaluation report seen: detail for Quality –Competence - specialize – Service: total 80 points.

3.5.4 Management of Outsourced processing

N/A, no outsourced processing

3.6 Specifications

Specifications of products were established. The detail and criteria that complied with legal (both local and destination country) and including customer requirement. The specification include the requirement of sensory, chemical, physical, microbiological norm, shelf live, packaging, storage condition.
The specifications are established for all raw materials and packaging and finished products.
Raw fish[redacted]
The general Finish product [redacted] - frozen raw finished product with chemical soaked and [redacted] - finished product without chemical soaking step; this specification has been revised in order to comply with new legislation TT15/2009/TT-BNN, TT09/2010/BNNNT, QD 2864/2011/QD-BNN and QD 1471/2012/QD-BNN, QD1640/2012/QLCL-CL 1.
Appearance: color, blood spot, fat spot, bone, broken, soft meat, glaze.
Chemical treatment can use[redacted]
Micro: TPC, E. coli, Enterobacteriaceae, S. aureus, Salmonella (neg/25gram), Vibrio Cholera, Shigella spp, Listeria monocytogenes (neg/25gram)
Chemical (Chloramphenicol, Nitrofuran, Enpro, Cipro, florfennicol, sulfadiazine.
Heavy metal : Hg 0.5ppm, Cd 0.05ppm, Pb 0.5ppm, Dioxin as PCB's P2O5 5ppm, salt 1.5% weight. Packing in plastic bag
Also check customer requirement/specification through vertical traceability:
Commercial invoice No VHC – INV2018 – 2553 dated 23.7.2018, container No MNBU3263154, product Sweet Chilli Marinated Fish fillet packing 260gram/BOX * 8/CTN.
Specifications of products were established. The detail and criteria that complied with legal (both local and destination country) and including customer requirements. The formal agreement on product specifications were done and also with mutual signature. It's seen both of supplier and customer on specification sheet. Some specifications were verified such as product: pre-fried breaded lemon black pepper and frozen raw pangasius etc.
Specifications were review and updated yearly and when changed.[redacted]

3.7 Corrective and preventive actions

Corrective action & preventive action procedure [redacted]. Non conformances are assigned to a person to investigate with a timescale included
The content of root cause, correction/corrective actions, responsibilities & timeframe & verification of corrective actions taken have been defined in procedure.
For example, corrective actions for NCs found during the internal audit were taken to follow corrective action procedure.

3.8 Control of non-conforming product

Detailed responsibility/authorisation level of every type for non-conforming product are defined non-conformity handling procedure [redacted]. Non-conforming products are identified in raw materials, semi products, finished products and packaging materials that do not meet specifications, non-conforming products are labelled with pink colour, isolated and quarantined. Nonconforming products can be treated through concessions, down grading, reworking or discarding. The Production manager and QA are mainly responsible to control this process. Staff understanding was confirmed by interviews during the audit process. There is no non-conforming products reported and there was no product on hold during the audit.

3.9 Traceability

Defined in Recall and traceability procedure [redacted]
All lots of raw materials coming in are identified by label and recorded on paperwork. All steps enable trace of raw materials and packaging from suppliers through processes to packing and loading.
Finished products include digits: X ABC Z Y DDD T:

[redacted]

All packaging is lot coded supplier/ quantity.
Testing recall and traceability including backward and forward is planned once a year and the last one done on 3-Aug-2020, product: frozen raw pangasius, Customer [redacted], lot number: VHC-SO2020-1185 C1 LOT 189, [redacted], quantity: 1 600 cartons, deliver date: 27-April-2020.
Testing forward traceability was performed on 29-Aug-2020 for raw fish Pangasius, [redacted]
Reporting of lots traceability and investigation seen and shown total time for completed traceability record within 2 hours and mass balance archived.
Choose sample with complicated processes manufactured within 2 – 5 months for traceability test by auditor during the vertical audit for product marinated fish lot [redacted], contract no. [redacted], [redacted], customer [redacted], quantity: 2300 cartons, size 12 -20, block 1 kg/bag, no glazing
Lot printed on carton: [redacted], lot number of RM: [redacted], testing report of antibiotic [redacted]
Testing report no. [redacted] for raw fish pangasius, [redacted]0 showed antibiotic not detected.
Take sample fish and checking fish before harvesting recorded on the form on checking material no. [redacted]
Monitoring of raw fish pangasius receiving and inspection report ([redacted]
M Monitoring of slaughtering and washing 1, [redacted] showed monitoring replacement water every 2 hour, washing time.
Monitoring of fillet - washing 2 – skinless [redacted] showed temperature of water < 20 degree C, replace water every 2 hours
Monitoring of parasite checking [redacted] showed checking temperature of product < 15 degree C, 100 % checked parasite by worker and sampling checking by QC at least 3 sample every hour.
Monitoring of sizing and washing 3, [redacted] showed washing time 30 seconds, temperature < 10 degree C
Monitoring of mixing & additive treatment, [redacted]
Monitoring of weighing and mix additive [redacted] showed CT3 including NA, lot no. [redacted], NB, lot no. [redacted]
Incoming inspection report [redacted]
Monitoring of colour grading and sizing, dated 12-Nov-2020 showed tempt of product < 10 degree C
Monitoring if receiving of flour, spice additives and oil [redacted] showed ingredient used:

- Salt, [redacted]
- Sugar[redacted]
- Potato powder[redacted]
- Glutamat, lot no. 1111201, supplier: Ajinomoto
- Oil[redacted]

Monitoring of cutting, [redacted] showed temperature < 10 degree C, size = 12 – 20
Monitoring of marinating with sauce and weighing [redacted] showed time 10 – 15 minutes.
Lot number of PA/PE bag[redacted]
Monitoring of freezing (IQF line), [redacted] showed temperature of core product = - 19 degree C
Monitoring if testing metal machine for bag [redacted] showed test piece used Fe = 1.5, non-Fe= 2, SUS = 2.5 mm.

Monitoring of lot number of packaging, allergen on label[redacted] showed checking allergen information hourly during the packing.
All records related to traceability by auditor can be retrievable and completed within 2 hours and mass balance found compliance.
No rework used.

3.10 Complaint-handling

The customer complaint procedure [redacted] was available, define clear step, responsibility of each function when receiving the complaint.
There are total 19 complaints reported in year 2020. All customer feedback, customer complaints are recorded, it is related to quality (sensory, packaging, texture. For example, checked complaint plastic debris from customer. [redacted], [redacted], customer complaint will be received by sale department, root cause have been analysed by QA & production department, action taken is reviewed by QA manager/ Processing plant manager. Seen the log file report of customer complaint, seen record of all customer complaint, record include the description of complaint, evaluate, correction, corrective action (if justify), case foreign object hair in product with corrective action picture seen. Complaint trend is in normal trend, less than last year performance. Have review record relate to freezing burn, plastic inside, insect in the product, over glazing, cause, correction, corrective action, response to customer have been reviewed.

3.11 Management of incidents, product withdrawal and product recall

The emergency preparedness response procedure [redacted] is in place. Contingency planning for emergency response includes disruption to key services such as water, energy, transport, staff availability and communications events such as flood or natural disaster, malicious contamination or sabotage. All responsibilities with communication channels and contact list were established and implemented. Security of materials reception, the packaging store and the finish product store were also taken into account and identified in the procedure.
The factory also has additional measures [redacted] to control covid-19 pandemic such as keeping social distance, measure temperature when entering the site and disinfecting hand frequently.

Recall and traceability procedure [redacted]. Recall team is set up including 17 members: Ms Nguyen Ngo Vi Tam – General Director is team leader and responsible for making final decision in case of recall. Annual mock test is defined in the recall procedure. The procedure also includes informing to Certification Body (Bureau Veritas Vietnam) in 3 working day if a recall occurs. The contact list was available, including contact number of the Fire Emergency, Hospital, Supplier list, Customers list, Certification Body (Bureau Veritas Vietnam), and Public health dept., expertise Bureau Veritas VN is used for notification in the event of product recall.
Mock recall is planned twice a year and the last one was done [redacted], product: frozen raw pangasius, Customer [redacted], lot number: [redacted], MFG date: [redacted], quantity: 1 600 cartons, deliver date: 27-April-2020

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.4	No exception for suppliers
3.5.2.3	No live animals

3.5.4	No outsourced processing and packing.
3.9.4	No rework of packed product undertaken

4. Site standards

4.1 External standards

The factory is located in separated area which has no local activities that would cause product contamination. External yard surface is made of concrete and kept clean, well-maintained and in good condition. All waste bins were in good condition, cleaned and covered with lids. The building fabric was well-maintained. Monthly external inspections are done with immediate actions implementation. The site is surrounded by 3 m height brick wall. There was no source of pollution observed. There was adequate space for pest inspection around the building. No standing water observed. Surrounding areas are maintained in clean condition, inspected quarterly to prevent the risk of contamination to products.
Exterior building fabric maintained to prevent ingress of pests, standing water and birds roosting.

4.2 Site security and food defence

Security at site follows procedure [redacted]
Annual risk assessment for security threats and food defense was performed and updated [redacted] covered all areas in the factory and processes.
Sensitive areas include gate entrance, packing and storage areas. At all employee entry must be identified with cards and visitors must declare information and be accepted by the security team.
Camera system with 17 cameras installed inside and outside in sensitive areas.
Control measures were established depend upon risk levels. Examples of control were as follows:

1. Security at all guards in 24/24
2. Camera surpervised working continually and in all areas in factory.
3. Loading area control and transportation control
4. Access control

Frequencies of control and monitoring were established and done depending upon risk levels identified for each area. Identified critical areas were production entrance, storage gates, production and storage areas. Only authorised person/right staff is allowed to access to production areas & storages. Ingredients, chemicals & packaging materials warehouses are secured with locks and managed by storekeepers. Visitors and agents of raw material must declare information with identification card on time.
External water tanks area is locked with nominated access.
Security training for employees was done [redacted].
No raw materials and packaging are stored outside.
Registration with authority is not required by legislation.

4.3 Layout, product flow and segregation

Comply with QCVN 02-01:2009/BNNPTNT – General condition for food safety of processing factory. Three plant there, water treatment, waste treatment, chemical room, packaging warehouse separate, layout cover all area in the site
There is three workshops in the in the site in which workshop two if for value add product such marinate & pre-fried product, one & three is for frozen fish
The process flow diagram is showed one way arrange of route of material to prevent cross contamination, rooms segregated by wall from floor to ceiling. Stored in dedicated warehouses (packaging, chemical,

cleaning chemical). Food additive & packaging transferred into production through dedicated equip, which locked from inside. The processing line fully segregated by wall. Self-contained design and have particular rooms for washing of utensils. Entrance to each processing area with dedicate staff check the personnel hygiene, no seen temporary structure, any construction activity is limited, identified.
The layout clearly showed the access points, route of movement & correct risk level identified. Low risk was defined from raw material receiving to primary packing step, enclosed product as warehouse. No high risk, high care or ambient area. The product is required fully cooked before eating.

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

The factory was built long time ago but facilities are repaired and maintained annually thus general condition of the building is suitable for food production and can prevent product contamination.
Floors are made from ceramic and are smooth and easy to clean.
Walls are made from concrete, aluminium & glass, smooth and easy to clean.
Ceiling and overheads are suitable to prevent contamination.
Door and window are in good hygiene, curtains are installed in the doors.
Drain system is designed in one way so it prevents back flow. Layout of drain map is in place for all areas including high risk.
The lighting is covered by shafted proof sheets. No excessive condensation was observed during the onsite audit. Ventilation fans, drainage outlets were screened with fine net to prevent pest ingress.

4.5 Utilities – water, ice, air and other gases

Water control followed SSOP 01[redacted]

Water is supplied from river and passes through treatment system with 3 stages: neutralizing with chemical NaOH, sand filters, activated carbon filter that outlet water meet national technical requirements for potable water QCVN01:2018 (Vietnam Regulation) & EU directive 98/83/EC.
Water schematic system is established and reviewed [redacted]
Water quality is tested daily pH, chlorine residue, ferrous and recorded. Test micro-organism in for water once per every 6 months in external laboratory. Verified result of portable water testing performed every 6months, the latest report. [redacted] 42 indicators e.g.: pH 7.52 – Nitrate ND (Lod 1.0ppm) – Nitrite ND (Lod 0,02ppm) – Chloride 0.12 ppm (Lod 1.0ppm) – Fluoride ND (0,3ppm) – Cyanide ND (Lod 5.0ppm), Coliform ND (1cfu/100ml) – E.coli ND (1cfu/100ml) – Clostridium perfringens ND (1cfu/100ml) and 495 pesticide residue indicator with negative results – daily testing chlorine 0.3-0.5ppm by test kit. Seen record found compliance to QCVN01-1:2018/BYT on the quality of water used for human consumption

4.6 Equipment

Critical Equipment: three plant with separate equipment metal detector (15 units), Tanks, belt, IQF conveyor, IQF, contact freezers, size grading machine, air conditional, breading machine, cold warehouse, plastic / stainless steel baskets. The main surface which is contacted with product is stainless steel suitable for food processing. Installed in a way that easy for cleaning. At each workshop there is a cleaning room for equipment which is physical separated from processing line, storage in safe & clean

4.7 Maintenance

Procedure in document code [redacted] – Equipment management available, the maintenance procedure had defined requirements for the commissioning of new equipment and the site has a documented clearance procedure in place after maintenance and the subsequent cleaning operations, hygiene check after maintenance signed & confirmed by QC in-line

The approved plan [redacted] are defined in monthly cover three workshops with in detail for each month and record after implementation, Monitoring the maintenance result are kept fully.
The hygiene procedure is applied the same worker in production.
Checked list of machine in plant 01, total 42 machines.
Maintenance record of air conditional, cold warehouse was seen in document [redacted], check hygiene after maintaining, monthly maintenance dated 24.1.2021, 12.7.2020 for cold warehouse , flake ice
Work instruction in document [redacted]
Food grade grease used TurmosynTH 1001 NSF H1 register

4.8 Staff facilities

Sufficient lockers provided for personal items storage before entry main building. Designated changing facilities provided for staffs work at particular area & for visitors as well. Clothing, hair net incorporated with mask, gloves and boot provide all staffs and visitor prior to entry to production area. No high care and high risk area defined but the clothing colour is different at each area. Adequate hand washing facilities (water, liquid soap, chlorine) provided at entrance & inside processing area. Control in place to prevent re-use of disposable hair net & mask for visitors.
Nominated staff full-time supervising at entrances. Boots washing & hand washing facilities directly prior entrance of production.
Smoking only permitted outside at designated area. Canteen facilities locate externally far from production. Eating at canteen area far from processing area

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

4.9.1 Chemical control

Chemical control follows the procedure SSOP 07: Chemical control[redacted]
List of approved for purchasing chemicals is in place and include detergents, alcohol and chlorine.
All chemicals were kept in locked rooms. Designated areas were assigned for all chemical storage, MSDS & label seen.
No scented chemicals were used in the factory.

4.9.2 Metal control

Physical contamination control procedure (SSOP 03) was established to be used recommended as guidelines. Daily inspection was done and no record of breakage in previous record.
Metal control program was in place to avoid product contamination. Knives were inspected as daily (before and after work shift). From the hazard analysis, foreign body detection (metal detector) was decision as CCP with monitoring plan.
Seen the foreign body monitoring from of workshop 1-2-3 [redacted] available and compliance.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass and brittle materials are controlled by the procedure SSOP11[redacted]
List of registered glass and hard plastic items is in place. Daily checks are recorded in the housekeeping report
Glass control procedure (SSOP11) includes steps need to be implemented in case of breakage happen.
No breakage reported until audit time. Staff have received training in procedure.

4.9.4 Products packed into glass or other brittle containers

N/A, product not packed into glass container

4.9.5 Wood
Wood is excluded in production area. The factory does use wooden pallets in FG warehouse and additive storage. Status of wooden pallet inspected daily and recorded.
4.9.6 Other physical contaminants
The factory does not have debagging / deboxing activities for raw materials. Design of pens without parts, control quantity and status is checked daily. Stationery items used in production such as pen, calculator, ruler etc listed and controlled quantity and damage status daily checklist.
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
Used metal detection as a control measure for CCP at packing step. Correct location: All products through metal detector after prim-packing. Detectors tested hourly with test pieces Fe = 1.5, Non-Fe = 2.0 , SUS = 2.5 mm. Tested include single products and consecutive products and allow detected product to be belt stop, audible and visual alarm. Work Instruction of metal detector and Corrective action posted in place. Equipment programs selected by package size. Contaminant product is stored secure, investigate the source of contaminated, managed by QA department No historical failed test.
4.10.2 Filters and sieves
N/A. no filter and sieve used
4.10.3 Metal detectors and X-ray equipment
Metal detector used to control foreign body based on risk assessment of HACCP system. Testing metal detector is defined as per the CCP HACCP plan, Metal detector is installed for each packing line, located in primary packing process and right before packing into carton, QC staff is responsible to test metal detector at start up, finishing production and every hour with 3 pieces samples Fe = 1.5 mm, non-Fe = 2 mm, SUS = 2.5 mm. All products pass through metal detector and when metal detector finds metal, belt will stop and alarm system is operated to identify problem. Corrective actions when the metal detector fails to detect test pieces is defined in the CCP plan. Stop metal detector, QC holds product from previous testing and handles it as NC products and inform maintenance department to repair metal detector. Rejected product is checked and anything found is examined for origin Personnel in charge of testing metal detector was challenged during the tour and demonstrated understanding of the metal detector operation.
4.10.4 Magnets
N/A, no magnet used
4.10.5 Optical sorting equipment
N/A, no optical sorting equipment used
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
N/A, product not packed in glass container

4.11 Housekeeping and hygiene

Sanitation procedure SSOP03, SSOP04 [redacted]. All cleaning staff trained and refreshed training yearly, cleaning team in production is specific assigned. Cleaning procedures have been developed and verified by QA department. Mainly manual method, disinfecting with chlorine 100-200 ppm, final rinse with potable water. For the distribution system of food additive solution, simple cleaning by prepare chlorine solution 100-200 ppm in mixing tanks & pumped to soaking tank, fill & soak for 15 minutes. Validation carried out on set up of new equipment with machine manufacturers and have included extensive swabbing programs for TPC, Coliform.
Cleaning team was arranged onsite during processing, cleaning equipment is specific arranged for each area, contact surface & non-contact, different colour
All equipment, tools processing cleaned before and after shift work.
No third party service provider for cleaning and disinfection activities.

4.11.7 Cleaning in place (CIP)

N/A[redacted]

4.11.8 Environmental monitoring

A documented environmental monitoring programme is in place, based on a risk assessment. Swab test for surface contact, non-surface contact, worker hand to verify effectiveness of environment hygiene program planned weekly in internal lab and once per year in external lab. For example, test report no. [redacted] in NAFIQAD lab for surface contact, non-surface contact (floor, wall), worker hand, PPE showed Coliform, TPC, Vibrio cholerae not detected. Internal testing report no. [redacted] showed Coliform, E.coli, Salmonella, TPC compliance with specification (TCKN), [redacted]. The plans will be reviewed annually at least and if/or when there are changes in processing/equipment or where the programme has failed to pick up a serious issue for example.

4.12 Waste

Head, bones of fish waste identified by red tanks in production area. Every 30 minutes transfer external & continuous transfer to fishmeal/fish oil factory for feed manufacturing. No risk to finished product

Environmental supervising report to authority every 6 months, report from July – Dec 2020 was seen. The waste water is treated before releasing to environment. Output of waste-water treatment system is A grade QCVN08:2011, testing 04 times/ year, waste water test report [redacted] meet the standard QCVN 11:2015 /ministry of environment.
Have a hazardous waste collection contract: [redacted], Registration license: [redacted]. Hazardous waste management report dated [redacted] was seen. Outside processing plant have the container with cap cover, daily removed.
Remain trademark of packaging material from product is returned & stored in packaging warehouse, labelled, any further use or disposal is informed & approved to customer, record of destroy in quantity.
Authority report of environmental waste water & working environmental [redacted], the result meet the regulatory.

4.13 Management of surplus food and products for animal feed

Generally, very limited of surplus product is produced, this product is stored in the warehouse and treated following customers instructions, not provided to staff.

Food waste is sold to external service following regulation, removed daily & the of quantity disposal is recorded.

4.14 Pest management

Pest management followed SSOP 09: Pest control[redacted]
Pest control has been check by both in house and external service. Target pest insect, rat. Permanent install bait trap (100 traps) , daily monitor.
For external service, contract with VFC Pestman- Can Tho branch to control rodent and insect. Contract [redacted] was seen.
Covers rodents and insects, both internal and external cages are used, covered all area of 3 workshops. Two treatment per month.
Record on [redacted] daily inspection of cage trap & weekly inspection of electrical fly killers has been verified. Service report of insecticide twice/month, report dated Jan and Feb 2021 available.
Available for some using instructions of permethrin, deltamethrin, alpha cypermethrin, bifernthrin, etoferprox.
The monitoring of pest monthly done by VFC clearly the used dosage.
Pest analysis is done every month, last records [redacted] check found no deviation, in normal situation. Record of pest control monitoring without pest infestation. No further action recommended
In case of find pest, the service have to be notified, together with factory investigate the problem & futher treatment, there was no record of pest infection noted.
Trend analysis is performed every quarter by the company staff based on data of pest control inspection reports. The last trend analysis was done [redacted]
Interviewed employees and they show good awareness of reporting process to the responsible person in case if an infestation is found.
Pest control in-depth survey is planned once per year and done by external contractor, the last one was done [redacted] by contractor VFC and pest control survey report was reviewed and found compliant.
There is no pest infestation found at the time of the audit and no infestation reported since the previous audit.

4.15 Storage facilities

All ingredients were stored separately and complied with its required condition stated on labels. Materials have been stored off floor and away from walls in accordance with warehousing procedure.
There are finished products separated warehouse for each processing plant and one packaging store, one additives store in the factory.
Finished products are stored in – 18 degree C and temperature is monitored automatically, verified daily by warehouse keeper and recorded.
Raw materials and packaging transportation is done by suppliers and inspected on arrival by QC staffs to ensure compliance with specification.
No external storage.
The ingredients and packaging materials were identified with stock cards to facilitate correct stock rotation of raw material. FIFO principle is applied when delivered raw materials and packaging for use in production. All packaging materials are stored on pallet with identified label and for part used packaging in production stored in designated area on pallet.

4.16 Dispatch and transport

The procedure to control the hygiene of transportation and ensure the security and temperature during the transport has been defined clearly [redacted]. All finished products when loading inspection: seal band status, sanitation condition and temperature. During transport temperature recorded by thermometer data logger.
Record of temperature monitoring as chart from traceability was seen.

Raw material and packaging transport arranged by suppliers, checked including: temperature, hygiene, truck number.
The temperature and set on booking note under – 18C. The container temperature is control by customer and shipping line.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.3.5	No temporary structure
4.4.5	No suspend ceiling at site
4.4.6	No walk way passed over production line
4.5.3	No air, other gases or steam used in food contact
4.9.1.2	No scented or taint forming materials used
4.9.4	No product is not packed into glass or brittle container
4.10.2	N/A, no filter and sieve used
4.10.4	N/A, no magnet used.
4.10.5	N/A, no optical sorting equipment used.
4.10.6	N/A, product is not packed into glass or brittle containers
4.11.7	No CIP system used
4.15.4	No controlled atmosphere storage
4.15.5	No outside storage

5. Product control

5.1 Product design/development

Follow new product development procedure [redacted]. There is no trial new product since year 2020. New product is developed by mother company in Singapore.

Little new product variations other than change of raw materials. Other changes/ modification in ingredient, suppliers, and process parameters will be validated by the HACCP team prior to implementation during the HACCP review meeting.
Shelf life was validated following determined shelf life in the HACCP Plan by taking sample in line with similar products and confirmed from product batch. Sample held and assess on-going shelf life on microbiology and organoleptic every 6 months.
No any customer specific requirement to claim up to now.

5.2 Product labelling

Packing label is designed and approved by customer including product name, types, size, ingredients with allergens printed bold text, production date, lot number, nutrition information, weight, etc.
Labelling information is designed and controlled according to local law and EU 1169-2011
Check labelling information including allergen is defined as CCP and checked every hour by QC during the packing and recorded in packing report.

5.3 Management of allergens

Allergen was defined control by Allergens Control Procedure [redacted]
Risk assessment for allergen was included in HACCP plan. Allergen identified within raw materials is fish, gluten and labelled on all finished products. Allergens cross contamination is well managed by Allergens Control Procedure [redacted]
Verify weekly swab test protein after cleaning and testing report done on [redacted] showed compliance.
Bringing food to production and storage areas is prohibited. All staff has been trained in awareness of allergens & cross contamination of allergens [redacted].

5.4 Product authenticity, claims and chain of custody

There is no claim such provenance, low fat, reduce sugar but the product is certified some other scheme such Global Gap, ASC, BAP for farm.

The site has a documented vulnerability assessment in place was describe is raw material assessment document [redacted], risk of fraud was defined as low since the fish is from factory own, no economic value if change material, the evaluation based on the ability, history, economic easy to find out in chain, natural of material, the reviewing plan of vulnerability assessment as one a year with HACCP review. The contracted farm are noncertified standard.
The factory has been certified Global GAP, ASC and BAP, audited by third party certification every 12 months. All data input on computer to monitor & facilitate to calculate conversation ratio of any period given. Mass balance tests by company every 6 months.
GMO material not used in factory. Certificates of GMO from supplier and guarantee letter were maintained seen from supplier, verification by test report also did not have GMO.
[redacted]

5.5 Product packaging

Packaging plastic PE/PA supplier is [redacted]t has been approved and BRC certified e.g. packaging with site code [redacted] PA/PE bags has declaration of compliance and has been tested for migration in compliance with local QCVN12-1:2011/BYT and Annex III, 10/2011/EU and EU10/2011.
For example, checked PA/PE from supplier [redacted], BRC certified with site code [redacted], migration testing report no. [redacted] issued by Quatest 3 laboratory shows heavy metals (Pb, Cd, Hg, Cr6, Ba, Cu, Co, Fe, Li, Mn, Zn) and overall migration compliance with EU 10/2011.
Packaging warehouse is kept clean. Products contact liners are in blue colour different from shrimp.
Contract with packaging suppliers state clearly that no staples or similar metal risk is accepted from packaging materials including carton box.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Test and inspection results were conducted by internal and external lab. Results were reviewed regularly to identify trends.
Testing plan of raw material and finished products reviewed. General testing plan for year 2020 & 2021 reviewed:

- Raw pangasius tested antibiotic residue every pond before receiving and test verification every 3 months. For example, checked testing report no. [redacted] in Intertek lab, [redacted] in Intertek lab for raw pangasius fish showed : Chloramphenicol, Nitrofuran (AOZ, AMOZ, SEM, AHD), Trifluraline, Malachite green, Leucomalachite green, Crystal violet, Leuco Crystal violet, Ciprofloxacin, Enrofloxacine, Flumequin, Tetracycline, Florfenicol, Sulfadiazine, Neomycin complied with decision 2864/2011/QD-BNN-QLCL issued in 2011 by Ministry of agriculture & rural development & amend #1471/QD-BNN-QLCL.
- Test other raw materials such as oil, powder mixed once per year in external lab. For example, checked testing report no. [redacted] in SGS lab for oil soya, [redacted] showed aflatoxin, heavy metal (Pb, Cd, As, Hg), peroxide, FFA, GMO compliance with specification TC09/2016/VH, dated 02-Jan-2019
- Finished product is tested antibiotic, micro, pesticide residue, heavy metal once per year in external lab. For example, checked testing report no. [redacted] in Intertek lab, [redacted] for frozen fillet fish pangasius showed antibiotic, heavy metal, pesticide residue compliance with specification.

Swab test for surface contact, non-surface contact, worker hand to verify effectiveness of environment hygiene program planned weekly in internal lab and once per year in external lab. For example, test report no. [redacted], dated [redacted] in NAFIQAD lab for surface contact, non-surface contact (floor, wall), worker hand, PPE showed Coliform, TPC, Vibrio cholerae not detected. Internal testing report no. [redacted] showed Coliform, E.coli, Salmonella, TPC compliance with specification (TCKN), dated 02-Jan-2020.
Assessment of on-going shelf life is followed shelf-life verification plan, product samples are tested every 6 months for organoleptic properties and microbiology to assess quality and food safety during storage.
Micro is also tested in finished products after expiry. Checked testing report for frozen fillet fish, MFG date: [redacted], internal testing report dated [redacted] show TPC = 10, Coliforms, E. coli, S. aureus, Salmonella, V. para, Listeria not detected and organoleptic compliance with specification.

5.6.2 Laboratory testing

Internal lab capacity: TPC, Coliforms, E.coli, Salmonella, S. aureus, Vibrio cholerae, Listeria monocytogenes, Y&M. Lab technicians have education background. The lab is separated from production areas.

The internal lab located separated area belong to Quality department and designed suitably for chemical & micro testing, authorized access only, protective clothing provided for internal lab, drainage system, ventilation is maintained in good condition.
The internal lab results are checked and compared with external test results regularly (NAFIQAD) and the lab staff is trained to conduct tests.
External laboratory such as CASE, Intertek, NAFIQAD are used to test verification of contamination. All external labs are accredited to ISO 17025.
When found testing result is out of specification, laboratory staff inform QA Manager and Non-conforming product handling procedure is followed.

5.7 Product release

All the record during the production and final product test to be reviewed before released.
QA manager is responsible for releasing product. QA manager are reviewed test and confirmed in dispatch records. All the record during the production and final product test to be reviewed before release

5.8 Pet Food

N/A. No pet food.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.2.3	No claims made to satisfy a consumer group (no nutritional claims)
5.2.4	No customers or nominated third party responsible for label information
5.2.5	No cooking instructions given
5.3.5	No rework used or reworking operations carried out
5.3.6/7	No allergen alibi labelling or claims
5.4.5	No claims related to method of production
5.4.6	No any claim
5.8	No pet food

6. Process control

6.1 Control of operations

Process control defined in GMP procedure for every process in the scope to implement and maintain products according to specifications. This defines control of all processes throughout from receiving raw material, pre-processing, mixing, breading, marinating, frying & cooling, freezing, packing etc. Hygiene condition checking including clearance on start-up, records kept on file.
All process parameters are validated by HACCP team and specifications are approved. Managers verify process monitoring report daily to make sure parameters are under control. In case of deviation found, the operator stops production, holds product and reports to managers to take further actions.

Randomly checked process control reports for product marinated fish lot [redacted], contract no. [redacted]
MFG date: [redacted]which details control information as:
Monitoring of fillet - washing 2 – skinless [redacted] showed temperature of water < 20 degree C, replace water every 2 hours
Monitoring of parasite checking [redacted] showed checking temperature of product < 15 degree C, 100 % checked parasite by worker and sampling checking by QC at least 3 sample every hour.
Monitoring of sizing and washing 3, [redacted] showed washing time 30 seconds, temperature < 10 degree C
Monitoring of mixing & additive treatment, [redacted]
Monitoring of weighing and mix additive [redacted]

6.2 Labelling and pack control

Labelling information and packaging material in use checked at the start up and 60 minutes interval during packing for confirmation of correct packaging. Record of packaging checking recorded reviewed compliantly.
Hygiene, cleaning, allergen material etc. are checked before production change over.
During the packing, all cartons are well arranged in good order, clear of the old cartons, checked during the tour found it is under good control.
Hygiene, cleaning, allergen material etc. are checked before production change over

6.3 Quantity, weight, volume and number control

Specific in contract with customer. Fish are weighting and counting every bag in unit or in bulk, weighed 100% unit before freezing, (extra weigh) & check after defrost. IQF fish defrost weigh check every hour. Final dispatch check again weigh as agreed with customer
Weight inspection record reviewed for traceability product practice.
Frozen fishery products – Testing Methods and Circular No 78/2009/TT-BNNPTNT: Regulation of inspection, sampling and testing the fishery product lot.
The Legal requirement relating to quantity control system (destination country) to be updated and controlled.

6.4 Calibration and control of measuring and monitoring devices

Measuring tool control Procedure [redacted] The Calibration plan 2021 [redacted] included: Thermometer, scale, set of weighs, metal detector. List of measuring device is available , check for plant 1 [redacted]
All equipment are coded, location used defined and calibration due date, tolerance defined. National standard of calibration are defined on the certificate.
The calibration is performed by internal & external service, on monthly, yearly

Sample check calibration records found compliance:
Internal calibration record [redacted] for thermometer, tolerance, error, method was seen, internal calibration for scale [redacted].
Internal calibration instruction was seen in document [redacted]
Thermometer – stamp [redacted], BY Quatest 3, range form -38degC – 42degC, code NK- 305 while in the procedure mention NK- S05, procedure dated [redacted]
Weights standard – [redacted] by Quatest 3, valid till 1.2.2022.
Metal detector calibrated dated [redacted] by AME A Chau service.
Training record of Nguyen Thi Phuong Uyen was seen , cert dated [redacted], Mr. Le Van Tam on 2013.
In the case the measuring device is found out of specification the product lot is labelled as "non-conforming" & kept separated in nonconforming product storage area, the QC manager evaluates the identified non-conformity, then suggests the action to the Managing Director whom makes the final decision, for all food safety issues it will be rejected. For the Tool – Equipment – they will check again and internally calibrate; if damaged, this will be replaced with a new device as clearly defined in [redacted]

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.2.4	No on-line vision equipment used to check product labels and printing
6.3.2	No product quantities not governed by legislations
6.3.3	No automated checkweigher

7. Personnel

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

Defined in Training Procedure [redacted]. All new employees training GMP, SSOP start working. Workers control CCP's must be pass examination trained course CCP control. Refreshment training annually.
Training Plan 2020 established and dated [redacted]: GMP, SSOP, HACCP, CCP control, internal security, awareness of QMS BRC, Allergen, first aid, chemical handling, glass control, ...Operators/staff monitoring CCP's annually refresh training, multi choice examination was taken as evaluation.
For example, checked training course for allergen labelling information checking done on [redacted] and training record seen.

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

Personnel hygiene policy has been defined in Personal Hygiene procedure Procedure SSOP4 r[redacted]. Communicated by initial training and refresh training, all requirements for personnel hygiene

are established e.g.: jewellery is not allowed in production area, not accepted long nails, smoking is only allowed at designed area with collection tray is available.
They have system is in place to monitor especially for inside processing area by assigned staff. Each entrance way to production area has installed hand washing stations with liquid soap/ clean water/ clean towels/ gloves/ chlorine 50ppm/ footbaths 100-150 ppm monitored by dedicated staff which cannot be avoided including supervision of open wounds. Daily sanitation status is recorded on [redacted] with date/ personnel hygiene checks/ conclusion – as reviewed.
Open wounds are not permitted in production areas. In case of cuts or grazes on exposed skin, the worker is not allowed to work in production and the metal blue plaster is used if needed.
Hand cleaning is done every 1 hour during production as defined on SSOP04 procedure. Storage of medicines is described in SSOP 04 Procedure and fresh trained for employees annually. Medicines is not allowed to bring into production area and stored at first aid box only.
NC7.2.5

7.3 Medical screening

Control by Personnel health control procedure SSOP 04 [redacted].
Medical screen for employees performed annually according to local law and visitor questionnaire used before entry production and storage areas.

7.4 Protective clothing: employees or visitors to production areas

Company provided working clothing, trousers, hats, masks, gloves, boots to all production staffs. Workers and staff must change to protective clothing before entering the production area. Each worker gets only one defined area to production. Blue plastic gloves seen during the tout.
Visitors/contractors are provided with white coats, hair nets, caps, masks, gloves and boots before entering production. All returned clothes are stored and washed separately.
Gloves are controlling and cleaning is done as per the risk assessment: gloves used at all steps are cleaned every hour by chlorine water. If necessary, other items are cleaned at a frequency based on risk
Laundry is done by in-house laundry department. Laundering room is under internal audit programme, audited at 6 monthly frequency. Washed protective clothes are protected in a transparent rounded, covered bin.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
None	

Template control	Food	Version	1.0

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
N/A, no high risk, high care defined
8.2 Building fabric in high-risk and high-care zones
N/A, no high risk, high care defined
8.3 Maintenance in high-risk and high-care zones
N/A, no high risk, high care defined
8.4 Staff facilities for high-risk and high-care zones
N/A, no high risk, high care defined
8.5 Housekeeping and hygiene in the high-risk high-care zones
N/A, no high risk, high care defined
8.6 Waste/Waste disposal in high risk, high care zones
N/A, no high risk, high care defined
8.7 Protective clothing in the high-risk high-care zones
N/A, no high risk, high care defined

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

9 - Traded Products

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

N/A, no traded products.

9.2 Specifications

N/A, no traded products.

9.3 Product inspection and laboratory testing

N/A, no traded products.

9.4 Product legality

N/A, no traded products.

9.5 Traceability

N/A, no traded products.