

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 1 of 49	

# Supplier and Co-Manufacturer Expectations Manual

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*Food Safety and Quality Systems*

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 2 of 49	

# Supplier and Co-Manufacturer Expectations Manual

## Food Safety and Quality Systems

### I TABLE OF CONTENTS

- I Table of Contents ..... 2
- II Introduction ..... 2
- III Leadership and Commitment ..... 3
  - A. Commitment ..... 3
  - B. Organization and Resourcing ..... 4
  - C. Roles and Responsibilities..... 4
  - D. Communication..... 4
- IV Customer and Consumer Focus ..... 5
  - A. Customer and Consumer Feedback Trend Analysis ..... 5
  - B. Consumer Based Recipe Management/Customer Specifications..... 5
  - C. Customer Audits..... 6
- V Process Management..... 6
  - A. Buy..... 6
  - B. Make..... 9
  - C. Ship..... 11
  - D. Change Management ..... 16
  - E. Document Management and Control ..... 16
  - F. Product Identification, Trace, and Recall..... 16
- VI Food Safety ..... 18
  - A. HACCP ..... 18
  - B. Food Defense ..... 21
  - C. GMPs ..... 22
  - D. Sanitation..... 28
  - E. Prerequisite Programs..... 31
- VII Compliance ..... 37
  - A. Lab and Test Methods and Validation ..... 37
  - B. State and Federal Laws and Regulations ..... 38
  - C. Quality Policies and Procedures..... 39
  - D. Audits..... 40
- VIII Continuous Skills Development ..... 41
  - A. Employee Training..... 41
- IX Continuous Improvement ..... 42
- X Appendix A: Definitions and Abbreviations..... 42
- XI Appendix B: Customs-Trade Partnership Against Terrorism (C-TPAT) Program..... 44
- XII Appendix C: Thermal processing..... 47

### II INTRODUCTION

ConAgra Foods views suppliers and co-manufacturers of raw materials, packaging materials, and finished products and other quality partners (collectively referred to as Suppliers) as an extension of our company. We respect our

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 3 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

supply chain network and strive for the development of a relationship with our Suppliers that will continually improve the product quality and safety that our customers and consumers demand.

The expectations set forth in this manual are a minimum set of quality programs that should serve as a solid foundation for Supplier quality systems. ConAgra Foods is committed to delivering safe, quality foods through the development, implementation, and maintenance of policies and procedures in accordance with ConAgra Food's policies and procedures, applicable international, federal, state, and local laws and regulations, and Global Food Safety Initiative (GFSI) standards. We rely on our Suppliers to embrace these programs and implement a culture that continually pursues improvements in food safety and quality to levels well above these minimum expectations.

This manual does not outline or mandate how to set up or operate a Supplier's facility to meet the expectations set forth by ConAgra Foods. Suppliers are solely responsible for operating their facilities in a manner that complies with this manual and all applicable federal, state, and local laws and regulations in both the country of manufacture and country of destination for the finished product manufactured using raw materials supplied by the Supplier if provided by ConAgra Foods, assuring the supply of safe products conforming to ConAgra Foods' purchasing specifications.

ConAgra Foods may establish and/or modify specification processes, operating guidelines, and procedures as industry, technology, and regulations change to guide Suppliers on specific expectations for the products supplied. These documents may assist Suppliers in establishing a set of clearly defined food safety and quality expectations, but in no way shift compliance responsibility from Suppliers to ConAgra Foods.

ConAgra Foods looks forward to building and maintaining a quality relationship with our Suppliers. Suppliers of raw materials and packaging materials should send any questions about ConAgra Foods or these expectations to [supplier.quality@conagrafoods.com](mailto:supplier.quality@conagrafoods.com). Co-manufacturers should send any questions about ConAgra Foods or these expectations to their ConAgra Foods Quality Representative. We will attempt to provide assistance and guidance on these expectations as requested and welcome comments and suggestions.

## III LEADERSHIP AND COMMITMENT

### A. Commitment

#### 1. Policy Statement

Suppliers shall develop and maintain a policy statement that includes, but is not limited to, the following:

- Commitment to supply safe, quality food products
- Methods used to comply with customer and regulatory requirements
- Commitment and methods used to continually improve its food safety and quality management system
- Commitment to establish and review food safety and quality objectives
- Commitment to maintain an effective GFSI certified food safety and quality management system

This policy statement shall be:

- Signed and dated by senior management

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 4 of 49	

# Supplier and Co-Manufacturer Expectations Manual

## Food Safety and Quality Systems

- Made available in language(s) understood by all employees
- Displayed and communicated to all employees

### B. Organization and Resourcing

#### 1. Organizational Structure

Suppliers shall maintain an organizational structure, identifying employees with responsibility for food safety and quality and describing their interrelationship. This organizational structure shall be dated, reviewed and updated periodically, and communicated within the organization.

#### 2. Resources

Suppliers shall provide adequate resources for the food safety and quality system.

### C. Roles and Responsibilities

#### 1. Food Safety and Quality Responsibilities

Suppliers shall identify employees with responsibility for food safety and quality, define their duties, and communicate their interrelationship in the organization.

Suppliers shall inform employees of their responsibility to report food safety and quality problems to management.

#### 2. Training Responsibilities

Suppliers shall define and document the responsibility for establishing and implementing the training needs of the organization's employees to assure they have the required competencies to carry out those functions affecting product legality, safety, and quality.

### D. Communication

#### 1. Regulatory Actions, Retrieval, and Hold

Suppliers shall notify ConAgra Foods immediately of regulatory actions or product retrievals involving finished products manufactured for ConAgra Foods.

If finished products manufactured for ConAgra Foods are sampled under regulatory action or retrieval, Suppliers shall immediately place those finished products on hold and take duplicate samples. Suppliers shall not release these materials without ConAgra Foods' approval. Samples shall remain at the Supplier's facility until a disposition is provided by ConAgra Foods.

#### 2. International Compliance Information Exchange (iCiX)

ConAgra Foods uses iCiX to automate and manage Supplier documentation and nonconformances. We believe that interacting with our Suppliers through iCiX benefits both ConAgra Foods and our Suppliers by providing a process for two-way communication and enabling the exchange of food safety and quality systems documentation in a secure, rapid, and readily accessible system.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 5 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

For the most timely and accurate communication, Supplier participation in the iCiX system is required unless otherwise approved by ConAgra Foods.

For a list of required documentation, refer to the Supplier Requirements (Ingredient, Packaging, and Co-Manufacturing Suppliers) located under Compliance Documents on the ConAgra Foods Corporate iCiX site. For a link to the most current version of this manual, refer to the Reference page located under Compliance Documents on the ConAgra Foods Corporate iCiX site.

#### 3. Corrective Action Requests (CARs)

ConAgra Foods uses iCiX’s Incidents (CAR) system to communicate food safety, quality, and service issues and resolutions in a real time basis. Suppliers, with the exception of Co-Manufacturers, shall acknowledge CARs through the iCiX system in a timely manner, providing a complete response with actions that resolve the issue. Each CAR includes expected response times.

## IV CUSTOMER AND CONSUMER FOCUS

### A. Customer and Consumer Feedback Trend Analysis

Suppliers shall develop and maintain a documented procedure for tracking, reviewing, and resolving consumer (where applicable) and customer complaints.

### B. Consumer Based Recipe Management/Customer Specifications

#### 1. Certificates of Analysis (COA) for Food Component Specifications

Suppliers shall provide lot specific COAs to ConAgra Foods plants before or with delivery of the finished products verifying the lot complies with the Food Component Specification for the finished product in question, unless instructed otherwise by ConAgra Foods Supplier Quality.

Analytical and microbiological criteria listed on the Food Component Specification are comprised of both guidelines and specifications. Guidelines are target production values that are required, but do not have to be reported on the COA. Specifications are requirements that shall be met before product is released to ConAgra Foods and shall be reported on the COA. Suppliers can distinguish between guidelines and specification criteria on the Food Component Specification as the COA or COA/COC column is blank for guidelines and contains “yes” for specification criteria.

In addition to the required test results detailed on the Food Component Specification, the COA shall include, but is not limited to, the following:

- Manufacturer name
- Broker or distributor name, if applicable
- Manufacturing plant address
- Name of material
- ConAgra Foods material or item number
- Purchase order number

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 6 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Lot number(s)
- Date of COA
- Date of manufacture
- Tests performed
- Test methods
- Unit of measure/reporting unit (*i.e.*, amount tested)
- Test results
- Name and/or signature of person certifying the lot

In addition to the above information, COAs from third party laboratories, brokers, and distributors shall include the name and address of the laboratory, broker, or distributor as well as the original Supplier’s name and manufacturing facility address.

If the Food Component Specification only contains guidelines, Suppliers shall provide a document with the above information along with the results of all tests performed as part of the Supplier’s normal analysis of the lot.

*a. Additional Co-Manufacturer Requirements*

Co-manufacturers are not required to provide COAs with each lot of finished product supplied to ConAgra Foods unless otherwise specified on the ConAgra Foods specification.

### C. Customer Audits

ConAgra Foods shall perform an initial food safety assessment of Suppliers as part of the Supplier approval process. Additional audits may be conducted based upon supplier performance, risk assessment, and other factors determined by ConAgra Foods. Suppliers should complete corrective actions in a timely manner and document them in iCiX.

## V PROCESS MANAGEMENT

### A. Buy

1. Raw Material, Ingredient, and Packaging Specifications

Suppliers shall develop and maintain documented and current raw material, ingredient, and packaging specifications. Suppliers shall maintain a register of raw material, ingredient, and packaging specifications, including, but not limited to:

- Food additives
- Hazardous chemicals
- Processing aids
- Ingredients
- Packaging
- Label approvals

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 7 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Supplier raw material, ingredient, and packaging specifications shall show compliance with all relevant laws and regulations, including those of the manufacturing and destination countries.

*a. Guarantees*

Suppliers shall maintain Letters of Guarantee, Continuing Pure Food Guarantees, or equivalent documents for all incoming raw materials and ingredients. Suppliers shall obtain certificates of conformance and/or Letters of Guarantee, Continuing Pure Food Guarantees, or equivalent documents for all food contact packaging.

*b. Label Verification*

Suppliers shall develop and maintain a label verification program to assure correct labels are received and used during production.

*c. Additional Co-Manufacturer Requirements*

Co-manufacturers should purchase raw materials, ingredients, packaging, and contract services that impact finished product safety from a Supplier approved by ConAgra Foods.

Co-manufacturers may use raw materials, ingredients, and packaging received from Suppliers not approved by ConAgra Foods, but shall notify ConAgra Foods before use.

2. Nonconforming Material Management

Suppliers shall develop and maintain a documented nonconforming material (*i.e.*, raw materials, ingredients, packaging, finished products, and equipment) management program to assure any material that does not meet specifications is appropriately managed to prevent inadvertent use or shipment of the material. At a minimum, the program shall:

- Cover hold and release of nonconforming materials
- Assure adequate identification
- Restrict authority to release nonconforming materials to designated employees
- Cover destruction of nonconforming materials to assure they cannot be reworked or released for use
- Extend to offsite warehouses and/or storage locations
- Include nonconformances detected during receipt, storage, processing, handling, and/or delivery

3. Supplier Approval

Suppliers shall develop and maintain a documented supplier approval program to assure evaluation, approval, and regular review of potential and current suppliers and the purchase of raw materials, ingredients, and packaging exclusively from approved suppliers. The program should include, but is not limited to, food safety evaluations of suppliers' manufacturing and warehouse sites. Suppliers shall maintain a register of approved suppliers.

*a. Additional Co-Manufacturer Requirements*

Co-manufacturer supplier approval programs shall also include, but are not limited to:

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 8 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Raw material, ingredient, and packaging specifications agreed upon by suppliers and the co-manufacturer
- Risk analysis of raw materials, ingredients, and packaging provided
- Summary of supplier food safety plans and controls
- Methods for approving suppliers
- Certificates of compliance or analysis (*i.e.*, COC, COA)
- Supplier contingency plans for emergencies or unforeseen circumstances
- Methods and frequency for reviewing supplier performance

#### 4. Supplier Noncompliance

Suppliers shall develop and maintain a documented supplier noncompliance program to communicate and track noncompliance issues with their suppliers. The program shall require corrective action responses from identified suppliers addressing the nonconformance issues.

##### *a. Additional Co-Manufacturer Requirements*

Upon request, ConAgra Foods quality, procurement, or co-manufacturing shall participate in this program for co-manufacturers.

#### 5. Receiving

Suppliers shall develop and maintain a documented incoming raw material, ingredients, and packaging program. Suppliers shall inspect raw materials, ingredients, and packaging to assure cleanliness and suitability for processing into food and appropriate handling to eliminate contamination and minimize deterioration.

##### *a. Nonconforming and Not Yet Approved Raw Materials, Ingredients, and Packaging*

The program shall include, but is not limited to, process steps to prevent use of nonconforming raw materials, ingredients, and packaging and raw materials, ingredients, and packaging not yet approved by the Supplier's quality assurance team.

##### *b. Temperature Control and Segregation*

Suppliers shall receive and store dry raw materials, ingredients, and packaging separately from frozen and refrigerated raw materials and ingredients. Suppliers shall receive and segregate unprocessed raw materials and ingredients to assure there is no cross-contamination (*e.g.*, separation between raw and RTE areas).

#### 6. Inventory Management

Suppliers shall develop and maintain a documented inventory management program to assure the timely use of stored raw materials, ingredients, and packaging and to prevent stored raw materials, ingredients, and packaging from becoming a source of contamination.

#### 7. Contract Service Providers

Contract services may include, but are not limited to:

- Chemical management
- Cleaning
- Laundry



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 9 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Lawn care
- Maintenance
- Outside inspection (e.g., third party x-ray)
- Pest control
- Scales
- Trucking
- Waste

Suppliers shall define and document expectations for all contract services affecting food safety. These expectations shall include a full description of the service and detail relevant training needs.

## B. Make

### 1. Inventory

Suppliers shall document raw material, ingredient, and food contact packaging lot tracking to maintain full traceability.

#### a. *Additional Co-Manufacturer Requirements*

Co-manufacturers shall document raw material, ingredient, and packaging lot tracking through a usage log or equivalent tracking system.

Co-manufacturers shall develop and maintain a stock rotation program using first-in first-out (FIFO) or first-expired-first-out (FEFO) principles.

### 2. Finished Product Specifications

Suppliers shall develop and maintain documented finished product specifications. At a minimum, finished product specifications shall:

- Include microbiological and analytical parameters and limits as agreed upon and noted on the ConAgra Foods specification (e.g., PSM, Food Component Specification, Manufacturing Specification)
- Include labeling and packaging requirements
- Be accessible to relevant employees

Suppliers shall develop and maintain a program to assure they have and comply with the most current ConAgra Foods specification (e.g., PSM, Food Component Specification, Manufacturing Specification).

### 3. Process Flow

Suppliers shall design and organize the process flow to prevent cross-contamination and maintain a continuous flow of product through the process (e.g., separation between raw and RTE areas).

- Sensitive areas in which foods have undergone a “kill” step, a “food safety intervention,” and/or are subject to post process handling should be separated from other processes, raw materials, or staff that handle raw materials to assure cross-contamination is prevented.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 10 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Staff access points should be located, designed, and equipped to enable staff to don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination and cross-contamination.
- Product transfer points should be located and designed to avoid compromise of segregation and minimize cross-contamination.

#### 4. Sampling, Inspection, and Analysis

Suppliers shall develop and maintain programs for sampling, inspecting, and/or analyzing raw materials, ingredients, WIP, and finished products to assure raw materials, ingredients, WIP, and finished products comply with relevant specifications and regulatory requirements and are true to label.

Suppliers shall use methods approved for the intended food type by the AOAC (current edition), current methods of the US FDA or USDA, methods approved by ConAgra Foods, or alternative methods validated as equivalent to the accepted methods noted here for all analyses, whether performed by the Supplier or a third party laboratory. Suppliers shall document and maintain records of all inspections and analyses.

Suppliers shall perform and document organoleptic testing of finished products as required by the purchasing specification.

#### 5. Packaging

Suppliers shall develop and maintain a documented packaging program to assure finished product packages and shipping containers are properly closed and sealed and protect the finished product from environmental and shipping conditions. Suppliers shall maintain documentation of testing to assure proper closure, complete with specifications and descriptions of the test methods.

#### 6. Labeling

Suppliers shall develop and maintain a documented label control program to assure labels on both finished products and component materials comply with applicable laws, regulations, and ConAgra Foods purchasing specifications and requirements. At a minimum, the program shall address:

- Reviewing labels upon receipt against regulatory approvals, where applicable, and internal specifications
- Storage and use of labels
  - Prevention of mixing labeling stock
  - Maintenance of labeling integrity
  - Documented changeover procedure
  - Disposal of obsolete labels
- Assuring the label being used matches the finished product being manufactured

Suppliers shall assure labels for USDA inspected products are approved by the USDA and shall maintain documentation of said approval.

#### 7. Net Weight, Liquid Measure, and Piece Count Control Program

Suppliers shall develop and maintain a net weight, liquid measure, and/or piece count control program to assure that weight, content, and/or quantity requirements are met for all finished products manufactured for ConAgra

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 11 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Foods. Suppliers shall maintain documentation of testing and methods used to assure proper weight, count, and/or quantity control.

The program shall comply with all applicable laws and regulations and should follow guidelines of the most recent edition of NIST Handbook 133: Checking the Net Contents of Packaged Goods or FSIS Net Weight Labeling of Meat and Poultry Products, as applicable.

Package tare weights shall be verified on an ongoing basis to assure no significant changes have occurred in package weights.

Where check weighing devices are not present, existing weight control programs should continue as long as regulatory requirements are met.

#### 8. Changeovers

Suppliers shall develop and maintain a changeover program, including line clearance and code date changes. The program shall assure all printed packaging and labels are removed from line equipment at the end of the run, including partial cases and/or cases on conveyors before palletizing. Suppliers shall inspect the equipment and area and document said inspections.

#### 9. Rework

Suppliers shall develop and maintain a documented rework program outlining how nonconforming WIP and finished products are reworked. Suppliers shall maintain documented justification that the rework program does not present a food safety risk or have any effect on finished product quality or labeling. At a minimum, the program shall assure:

- Qualified employees supervise rework operations
- Clear identification and complete traceability of reworked product
- Clear identification of rework containing allergens
- Inspection and/or analysis of each batch of reworked product before release
- A documented break in the rework cycle
- Rework is used in quantities as noted on the specification

Suppliers shall maintain records of all rework operations. Suppliers shall include rework on the HACCP plan hazard analysis and flow chart. If rework is not used, Suppliers shall add a note to that effect in the HACCP plan.

##### a. *Additional Co-Manufacturer Requirements*

Co-manufacturers shall obtain approval from ConAgra Foods, either by specification or from ConAgra Foods Co-Manufacturing Quality, for all rework involving finished products manufactured for ConAgra Foods.

### C. Ship

#### 1. Storage

Suppliers shall assure that facilities used to handle or store raw materials, ingredients, packaging, WIP, and/or finished products are of suitable and appropriate design for the holding and storage of such items and are

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 12 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

maintained to prevent potential contamination of said items. Raw materials, ingredients, packaging, WIP, and finished products shall not be stored adjacent to either raw materials, ingredients, packaging, WIP, or finished products that have strong odors or chemicals, whether hazardous or non-hazardous.

Suppliers and carriers shall hold raw materials, ingredients, packaging, WIP, and finished products at temperatures recommended by the manufacturer during all stages of storage and transportation to ConAgra Foods.

Suppliers shall use storage racks constructed of impervious materials, designed to enable cleaning of the floors and storage area.

#### a. Cold Storage, Freezing, and Chilling of Foods

- Suppliers shall confirm and document the effective operational performance of freezing, chilling, and cold storage facilities.
- Suppliers shall design and construct chillers, blast freezers, and cold storage rooms to allow for the hygienic and efficient refrigeration of food.
- Suppliers shall assure chillers, blast freezers, and cold storage rooms are easily accessible for inspection and cleaning.
- Suppliers shall maintain sufficient refrigeration capacity to chill, freeze, or store the maximum anticipated throughput of product with allowances for periodic cleaning of refrigerated areas.
- Suppliers shall connect discharge from the defrost lines directly to the drainage system.
- Suppliers shall install and position easily readable and accessible temperature monitoring and recording equipment in freezing, chilling, and cold storage rooms to monitor the warmest part of the room.
  - Suppliers using continuous temperature monitoring should review charts on a regular basis.
  - Suppliers not using continuous temperature monitoring should periodically check and document temperatures to assure adequate temperatures are maintained.
- Suppliers should fit freezers and coolers with automatic controls to regulate temperature and/or an alarm system to identify significant temperature changes.

#### b. Storage of Dry Ingredients and Other Shelf Stable Packaged Goods

Suppliers shall locate rooms used to store dry raw materials, ingredients, and other shelf stable packaged goods away from wet areas. Suppliers shall construct storage areas to protect the raw materials, ingredients, and other shelf stable packaged goods from contamination and deterioration.

Suppliers shall maintain an uncluttered space at wall perimeters to assure ease of access for cleaning, inspection, and maintenance of equipment.

#### c. Bulk Storage

Suppliers shall develop and maintain a validated procedure for inspecting and cleaning silos and bulk storage tanks. Suppliers shall maintain bulk storage tanks appropriately for their designated use.

All bulk storage tanks for liquid sweeteners shall have a sterilized air system (e.g., HEPA Filtration or UV systems).

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 13 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall develop and maintain a program to prevent unloading the wrong material into the wrong bulk tank. This program shall assure bulk storage unloading ports are capped and locked.

*d. Storage of Packaging Materials*

Suppliers shall construct storage rooms to protect packaging from contamination and deterioration.

*e. Storage of Equipment and Receptacles*

Suppliers shall store equipment and receptacles in rooms designed and constructed to allow for the hygienic and efficient storage of equipment and receptacles. Suppliers shall not store processing utensils or packaging in areas used to store hazardous chemicals and/or toxic substances.

If possible, equipment and pallets should not be stored outside. If outside storage cannot be avoided, Suppliers shall store materials in a sanitary manner to prevent pest harborage and develop a program to clean equipment and pallets before re-entry into the building.

*f. Storage of Hazardous Chemicals and Toxic Substances*

Suppliers shall store hazardous chemicals and toxic substances in such a way that they do not present a hazard to staff, raw materials, ingredients, packaging, WIP, finished product, product handling equipment, or areas in which product is handled, stored, or transported.

Suppliers shall store pesticides, rodenticides, fumigants, and insecticides separately from sanitizers and detergents.

Suppliers should store all chemicals in their original containers.

Storage facilities for hazardous chemicals and toxic substances shall:

- Comply with applicable federal, state, and local laws and regulations
- Be designed to prevent cross contamination between chemicals
- Be ventilated to the exterior
- Contain appropriate signage indicating the area is a hazardous storage area
- Be secure and locked to restrict access only to those employees with formal training in the handling and use of hazardous chemicals and toxic substances
- Include a detailed and up to date inventory of all chemicals contained in the storage facility
- Contain suitable first aid equipment and protective clothing
- Have emergency shower and wash facilities available in the event of an accidental spill
- Be designed such that spillage and drainage from the area is contained in the event of a hazardous spill
- Include spillage kits and cleaning equipment

*g. Alternative Storage and Handling of Goods*

Suppliers shall conduct a risk analysis when holding raw materials, ingredients, packaging, WIP, or finished products under alternative storage conditions to assure there is no risk to the integrity of those items, no contamination, and no adverse effect on food safety and quality.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 14 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### 2. Release Procedures

Suppliers shall develop and maintain a documented finished product release program. The program shall assure finished product is released only:

- By authorized employees
- After all inspections and analyses are successfully completed and documented (*e.g.*, quality holds, pre-shipment review, microbiological testing)
- All food safety controls and parameters established by federal, state, and local laws and regulations and ConAgra Foods specifications have been met

Suppliers shall maintain finished product release records.

#### 3. Loading and Transport

Suppliers shall develop and maintain a documented loading and transport program. At a minimum, the program shall:

- Describe acceptable and unacceptable shipping container conditions
- Require documented inspections of shipping containers (*e.g.*, trailers, tankers, trucks)
- Require proper stock rotation (*i.e.*, product to be shipped by first expiration date)
- Include the handling of returned and/or brought back finished products

Suppliers should design loading and unloading programs to minimize unnecessary exposure to conditions and to maintain raw material, ingredient, packaging, and finished product integrity.

Suppliers shall provide finished products with sufficient shelf life remaining to allow for use by ConAgra Foods in a timely manner. Food Component Specifications may include more specific remaining shelf life requirements.

Suppliers shall adequately and legibly label each individual unit of finished product received (*e.g.*, pallet, box, bag) to identify it. The minimum information required on the label includes:

- Material name
- Lot number
- Ingredient statement
- ConAgra Foods' material number
- Manufacturer's name
- Date of manufacture and/or a best by/use by date

#### 4. Warehousing and Shipping Companies

Warehousing and shipping companies shall refer to the ConAgra Foods Warehouse Requirements Manual. Contact supplier quality at [supplier.quality@conagrafoods.com](mailto:supplier.quality@conagrafoods.com) for the most current version of the manual.

#### 5. Transportation

Suppliers shall assure transit vehicles containing finished product destined for ConAgra Foods are clean, dry, free of infestation and off odors, and in good repair.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 15 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall inspect vehicles used to transport raw materials, ingredients, packaging materials, and finished goods to assure they are in good repair, suitable for use, and clean upon unloading and prior to loading.

Suppliers shall perform and document inspections of transport vehicles, including checks for structural integrity, cleanliness, and overall suitability, prior to loading finished products.

Suppliers shall inspect all inbound and outbound shipments and vehicles. Documented shipment and vehicle inspections shall include, but are not limited to, seal verification and specific inspection criteria regarding safety, structural integrity, and sanitation.

Suppliers shall develop and maintain a program to check tanker logs to verify the tanker is designated as food grade and the prior load was an acceptable commodity or document the use of dedicated tankers. Suppliers should collect and check wash tickets.

#### 6. Seals

Suppliers shall develop and maintain a seal policy to assure no product has been tampered with or lost while under the carrier's control. Suppliers shall assure materials sent to external providers for repackaging, reprocessing, or other handling are sealed or locked appropriately during transport to and from the external provider location.

Containers shall have intact seals upon arrival at ConAgra Foods or co-manufacturers and the vehicle seal number shall match the original seal number applied at the original shipping point.

Containers shipped via less than truckload (LTL) shipping shall be intact upon arrival at ConAgra Foods or co-manufacturers. Chemicals, whether hazardous or non-hazardous, or materials with strong odors should not be shipped on the same truck/trailer with finished products destined for ConAgra Foods. While LTL shipments are not required to have a seal or continuous seal form because of the inherent nature of LTL shipments, Suppliers shall have the shipper secure trailers with a lock and the carrier shall assure that no product has been tampered with or lost while under the carrier's control.

Rail seals shall meet or exceed the current PAS ISO 17712 standards for high security seals. A high security seal is constructed and manufactured of material such as metal or metal cable with the intent to delay intrusion.

#### 7. Equipment Use

Suppliers shall assure that, when transporting food products intended for human or animal consumption, carriers do not use equipment which has also been used for the transportation of hazardous materials within the meaning of 49 USC§5102, solid waste within the meaning of 42 USC§6903, or which otherwise is not fully suitable for use in the transportation of any food, food additive, drug, cosmetic, or device within the meaning of those terms as used in 21 USC§321 or any other applicable law of similar kind or content.

All equipment provided shall comply with the Sanitary Food Transportation Act of 1990 and associated regulations or any other applicable law of similar kind or content. ConAgra Foods may reject equipment, at no cost to ConAgra Foods, if it does not pass ConAgra Foods' inspection standards or otherwise meet ConAgra Foods' requirements.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 16 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### D. Change Management

Suppliers shall develop and maintain a change management program to appropriately and completely manage any and all changes to raw materials, ingredients, packaging, manufacturing processes, recipes and formulations, specifications, labels, and/or manufacturing locations, including subcontracting.

Prior to initiating changes, Suppliers should notify ConAgra Foods of the intended changes so we can adjust our business practices as needed.

#### E. Document Management and Control

Suppliers shall develop and maintain a document control and record retention program. At a minimum, the program shall:

- Identify employees responsible for monitoring, verifying, maintaining, and retaining records
- Assure records are readily accessible and securely stored to prevent damage and deterioration
- Establish record retention timeframe requirements in compliance with periods specified by applicable laws and regulations

*a. Additional Co-Manufacturer Requirements*

Co-manufacturers shall maintain records for a minimum of one year beyond the shelf life of the product.

#### F. Product Identification, Trace, and Recall

##### 1. Product Identification

Suppliers shall develop and maintain a product identification program, specifying employees responsible for identifying product, including raw materials, ingredients, packaging, WIP, and finished products, during all stages of production and storage. At a minimum, the program shall assure:

- Product is clearly identifiable during all stages of receipt, production, storage, and transportation
- Finished product labels comply with customer specifications and all applicable laws and regulations
- If applicable, product labels contain the appropriate Kosher or Halal symbol of their Kosher or Halal religious authority.
- Product identification records are maintained

##### 2. Lot Coding and Lot Size

A lot is defined as a unit of raw material, packaging, or finished product that is clearly delineable in the context of an intervention or other controls that would allow any subsequent action on the product (*e.g.*, a recall) to be unquestionably limited to that unit. Lot definitions facilitate internal controls, provide clear boundaries around incoming raw materials and packaging, and potentially minimize the impact of a recall should a problem arise. Suppliers should document the cleaning, sanitation, intervention, documentation, and other controls used to achieve lot separation and the scientific rationale (*e.g.*, validation) for lot separation in the food safety plan.



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 17 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Separating lots with a specific food safety intervention such as a lethality step and complete cleanup is optimal, but is more challenging when products are manufactured in an essentially continuous production (*e.g.*, grains, flour). Regardless of the manufacturing process, Suppliers shall document their scientific understanding of the risks and a delineated means of managing the risk.

#### a. Coding

Suppliers may use their own internal lot code or code date system. Date of manufacture should be determined from this lot code or code date (*e.g.*, Julian calendar date). If date of manufacture cannot be determined from the lot code or code date, Suppliers shall maintain sufficient control of the lot to provide the date of manufacture upon request or provide a lot code interpretation document on iCiX with appropriate reader permission granted to ConAgra Foods.

Suppliers shall assure all raw materials, ingredients, packaging materials, WIP, and finished products have traceable lot codes that follow the item from receipt through storage and use. Blending and mixing records shall show times, quantities, and lot identification of raw materials and ingredients used.

#### b. Lot Size

No lot size should exceed 24 hours of production without scientific data to support larger lot sizes and preapproval from ConAgra Foods.

Suppliers shall post an interpretation of the lot size (*e.g.*, cleanup to cleanup, 2 hours of production, shift) and lot code or code date on iCiX with appropriate reader permission granted to ConAgra Foods.

#### c. Additional Co-Manufacturer Requirements

Co-manufacturers of individual retail or foodservice sale units shall use lot codes and code dates in the required ConAgra Foods format on individual packages and shipping cases. ConAgra Foods shall provide this information as part of the ConAgra Foods specification.

### 3. Corrective Actions

Suppliers shall develop and maintain a corrective actions program to describe methods for investigation, resolution, management, and control of corrections and corrective actions. This program shall include the identification of the cause and resolution of noncompliance of critical food safety and quality parameters. Suppliers shall document all investigations and resolutions of corrections and corrective actions.

### 4. Traceability and Mock Recalls

Suppliers shall develop and maintain a documented traceability program, which is capable of effectively tracing specific lots of raw materials, ingredients (including bulk ingredients), packaging, and finished products through shipping and distribution channels. At a minimum, the program shall:

- Assure finished product is traceable from the supplier (one back) and to the customer (one up)
- Specify processes to trace raw materials, ingredients, packaging, WIP, carryover product, rework, and finished products
- Detail methods to trace finished products back to the received raw material, ingredient, and packaging lots
- Include records of product transportation and destination

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 18 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### a. Emergency Contact Information

Suppliers shall post emergency contact information (*i.e.*, information allowing ConAgra Foods to reach emergency contacts 24 hours a day, 7 days a week, 365 days a year) on iCiX with appropriate reader permissions granted to ConAgra Foods.

#### b. Mock Recalls

Suppliers shall conduct and document at least two mock recalls at least annually to validate the traceability programs. Mock recalls should include a trace based upon at least one ingredient and one primary packaging material.

Suppliers shall prepare summaries for each mock recall describing the recall process and results with corrective actions addressing any discovered deficiencies. Suppliers shall make such summaries available to ConAgra Foods upon request.

#### 5. Recalls and Withdrawals

Suppliers shall develop and maintain a documented recall and withdrawal program. This program shall:

- Post emergency contact information (*i.e.*, information allowing ConAgra Foods to reach emergency contacts 24 hours a day, 7 days a week, 365 days a year) on iCiX with appropriate reader permissions granted to ConAgra Foods
- Identify employees responsible for activities during recalls and withdrawals
- Describe management procedures to be implemented in the event of a recall or withdrawal, including legal and expert advice
- Outline communication plan to inform ConAgra Foods in a timely manner of all recalls and/or withdrawals

Suppliers shall maintain documentation and records of all recalls and withdrawals.

Suppliers shall investigate all recalls and withdrawals to determine the cause. Suppliers shall document and communicate to ConAgra Foods any and all actions taken as a result of the investigation.

## VI FOOD SAFETY

Suppliers shall outline the means by which they control potential hazards and assure food safety, including, but not limited to:

- The results of a hazard analysis conducted to identify food safety hazards in raw materials, packaging materials, and the process
- Process controls at control points in production to monitor food safety and identify when a process is deviating from set parameters

### A. HACCP

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 19 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall develop and maintain a HACCP system based on the seven principles of HACCP as adopted by the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) to identify and control hazards associated with the material and/or process.

- Conduct a hazard analysis and identify preventive measures
- Identify Critical Control Points (CCPs)
- Establish critical limits
- Establish monitoring activities for each CCP
- Establish corrective actions to be taken when a critical limit deviation occurs
- Establish verification and validation procedures
- Establish a record-keeping system

Suppliers may provide a copy of the HACCP program to ConAgra Foods upon request. At a minimum, Suppliers shall provide the HACCP flow chart of the process and allow ConAgra Foods to view the plan at the Supplier's facility.

For products and processes with no CCPs, Suppliers shall perform a hazard analysis and maintain a flow chart, the hazard analysis, and supporting documentation to justify the decision not to have a CCP. Suppliers shall review the hazard analysis, supporting documentation, and flow chart at least annually or when the process, product, equipment, and/or other food safety related areas are changed. Suppliers shall perform verification and validation of all prerequisite programs used to justify decisions in the hazard analysis to support the absence of CCPs.

Suppliers supplying labeled packaging materials (e.g., labels, cartons, film, lids, cups) shall perform a hazard analysis to identify process steps where labels and/or materials could be mixed or incorrectly labeled, potentially resulting in ConAgra Foods receiving incorrectly labeled or materials with mixed labels.

At a minimum, Suppliers supplying food contact packaging shall perform a hazard analysis and maintain a flow chart, the hazard analysis and supporting documentation to justify decisions made in the hazard analysis. If necessary, a HACCP program shall be implemented. The hazard analysis should include management and control of packaging material components that will have direct contact with the food, either after packaging by ConAgra Foods or a co-manufacturer, to assure non-food grade material is not used and materials that could possibly migrate into the packaged food are kept at or below acceptable levels.

#### 1. HACCP Team

Led by a trained individual, Supplier HACCP Teams shall develop, monitor, review, and validate the HACCP program. All members of the HACCP Team should be trained in the principles of HACCP.

##### a. *Additional Co-Manufacturer Requirements*

The individual leading the co-manufacturer HACCP Team shall complete a training course certified by the International HACCP Alliance or other widely recognized authority.

#### 2. Prerequisite Programs/Preventative Controls

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 20 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall establish and maintain prerequisite programs, preventive controls, and corrective action procedures, including, but not limited to, the monitoring of corrective actions taken, to support the HACCP program.

#### a. *Additional Co-Manufacturer Requirements*

Co-manufacturers shall reference prerequisite programs, including, but not limited to:

- Allergen management
- Calibration
- Foreign material control and prevention
- GMP
- Preventive maintenance
- Sanitation

#### 3. Monitoring

Suppliers shall monitor critical limits for each CCP at a frequency defined in the HACCP program to assure implementation of and compliance with the program. The HACCP program shall describe who performs monitoring activities, how the activities are performed, and how often the activities are performed.

Employees responsible for monitoring activities shall sign and date each monitoring record. A master sheet may be used to clearly align signatures to employees names and titles. Suppliers shall maintain legible, thorough monitoring records.

Suppliers shall assure measuring instruments used to monitor CCPs, if any, are appropriate for and capable of measuring the critical limit(s).

#### 4. Verification

Suppliers shall establish methods, identify responsible employees, and develop criteria for verifying the effectiveness of monitoring activities to assure they achieve their intended purpose. The HACCP program shall describe who performs verification activities, how the activities are performed, and how often the activities are performed.

Suppliers shall document all verification activities. Employees responsible for verifying monitoring records shall sign and date each record verified. A master sheet may be used to clearly align signatures to employees names and titles. Suppliers shall maintain legible, thorough monitoring records.

Verification activities should include, but are not limited to:

- Record review
- Pre-shipment review
- Calibration activities, if measuring instruments are used
- Direct observation
- Annual reassessment

#### 5. Validation

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 21 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall establish methods, identify responsible employees, and develop criteria for validating prerequisite programs, critical limits, and other food safety limits to assure they achieve their intended purpose. Suppliers shall document all validation activities.

Validation activities shall assure:

- Critical limits are selected to achieve the designated level of control of the identified food safety hazard(s)
- Critical limits and control measures individually or in combination effectively provide control of the identified food safety hazard(s)

#### 6. Review and Reassessment

Suppliers shall review the HACCP program at least annually and when the process, product, equipment, and/or other food safety related areas are changed. Suppliers shall document the review process and maintain records of reviews and the review process (e.g., meeting minutes, records of changes). This review shall include, but is not limited to:

- Policies and procedures
- Internal and external audit findings
- Investigations, resolutions, and corrective and preventive actions for all deviations and/or failures
- Food safety related consumer and customer complaints
- Documented evidence of reassessments in the HACCP program

#### 7. Documentation

At a minimum, Suppliers shall:

- Maintain a current, signed copy of the HACCP program
- Assure the plant manager or plant authority signs the HACCP program upon creation and with each change
- Develop a HACCP program for each type of product or process
- Include a plant layout showing product flow in the HACCP program
- Assure a current flow chart, identifying CCPs, is available upon request
- Summarize CCPs, if any, in the HACCP program with critical limit(s), monitoring activities, corrective actions, and verification activities
- Include documentation of process capability to demonstrate the critical limit(s) is compatible with plant process capabilities
- Assure management maintains control of the product and process when deviations occur
- Document all deviations and corrective actions to demonstrate control of the affected product
- Maintain a deviation log
- Document the justification for monitoring and verification frequency in the HACCP program
- Document verification and validation of prerequisite programs listed in the HACCP program

## B. Food Defense

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 22 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall establish and maintain documented food defense programs to prevent food adulteration caused by deliberate acts of sabotage or terrorist like incidents. The program shall include, but is not limited to:

- The appointed management responsibility for food defense
- Methods to record and control access to the premises by employees, contractors, and visitors
- Appropriate employee screening programs
- Methods to assure only authorized employees have access to production and storage areas through designated access points
- Methods implemented to protect sensitive processing points from intentional contamination
- Measures taken to assure the secure storage of raw materials, ingredients, packaging materials, equipment, and hazardous chemicals
- Measures to assure finished product is held under secure storage and transportation conditions

#### 1. Public Health Security and Bioterrorism Preparedness and Response Act of 2002

Public law 107-188, June 12, 2002 (commonly known as the “Bioterrorism Act of 2002”) requires Suppliers of food materials and products to and within the United States to be registered with the FDA or USDA and to comply with all requirements of the Bioterrorism Act of 2002. Suppliers shall maintain records relating to shipments and receipts from suppliers (one back) and to customers (one up) for a period of at least three years.

#### 2. Food Supply Chain Security

ConAgra Foods is a Tier III validated company in the Customs-Trade Partnership Against Terrorism (C-TPAT) Program. C-TPAT is a partnership program sponsored by the Customs and Border Patrol (CBP), which encourages companies involved in the food supply chain and their business partners to voluntarily comply with established security standards and industry best practices. ConAgra Foods realizes many benefits resulting from our Tier III status, the highest awarded by CBP. It is imperative that Suppliers comply with C-TPAT security standards for us to maintain our Tier III status.

Suppliers shipping material to ConAgra Foods shall meet the minimum requirements for compliance with the C-TPAT program, which regulates the flow of product from the point of origin through the point of distribution. Suppliers shall provide a copy of the C-TPAT certificate and program SVI number to ConAgra Foods. If not currently C-TPAT certified, Suppliers shall participate in ConAgra Foods’ C-TPAT process, which includes a security self-assessment and on-site audits by ConAgra Foods. A description of the ConAgra Foods C-TPAT program is attached in Appendix B.

### C. GMPs

Suppliers shall develop and maintain documented GMP programs that control conditions to protect and maintain food safety and quality. These GMPs include, but are not limited to, the following:

- Employee training
- Product and material receiving, handling, and storage
- Employee hygiene and hygienic practices
- Control of employee illness and communicable disease

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 23 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Facility and equipment condition
- Facility structure and grounds

These GMP programs shall comply with 21 CFR §110 and the Codex Alimentarius Commission's recommendations on general principles of food hygiene, where applicable.

Suppliers should provide first aid facilities sufficient to treat minor injuries. Suppliers shall make suitable arrangements for patients requiring more specialized care. Suppliers shall assure employees are trained in proper mitigation steps to contain blood-borne pathogens.

#### 1. Employees

Employees with communicable, infectious diseases should not work in the processing operation. Employees with exposed lesions or cuts shall not handle product. Employees should use impermeable, sanitary material that is metal detectable to bandage minor lesions and cuts.

Suppliers shall not permit smoking, chewing, eating, drinking, or spitting in any food processing and/or handling areas. Employees shall not eat or taste any product being processed in the food handling/contact zone. If sensory evaluations occur in the food handling/contact zone, Suppliers shall implement controls to assure:

- Food safety is not compromised
- Authorized employees conduct all sensory evaluations
- Employees conducting sensory evaluations practice a high standard of personal hygiene
- Sensory evaluations occur only in areas equipped for that purpose
- Equipment used is sanitized and stored separately from processing equipment

Employees shall wash hands before beginning operations and after each absence or activity where hands are potentially soiled (*e.g.*, using the restroom, handkerchief/facial tissue use, handling dirty material, smoking, eating, drinking). If gloves are used, employees shall maintain hand washing practices. Employees directly handling product or product contact surfaces should clean and sanitize their hands after touching any non-food contact surface.

#### a. *Clothing*

Clothing worn by employees should not present a contamination risk to the product. Employees in high risk processing areas should not wear clothing or shoes off the premises that have been worn during processing. Employees shall wear clean clothing at the start of the shift. Employees shall change soiled clothing if it presents a product contamination risk. If shirts or smocks have pockets above the waist (or lower if exposed product is below the waist), Suppliers should assure pockets are sewn shut or enforce a policy that prohibits storing items in those pockets.

Employees shall change disposable gloves and aprons after each break, upon re-entry, and when damaged. Employees shall store non-disposable gloves and aprons under conditions that will not result in contamination when not in use.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 24 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Employees shall not wear jewelry or personal effects that present a potential product contamination risk. Employees shall not wear false fingernails or fingernail polish when handling food with bare hands or when working in exposed product areas.

#### b. Visitors

Visitors shall wear suitable clothing and footwear when entering any food processing or handling area. Visitors shall enter and exit food processing and handling areas through proper staff entrance and exit points and shall comply with all hand washing and personal hygiene requirements. Suppliers should have documented GMP requirements for visitors.

## 2. Facilities

Suppliers shall provide facilities to enable staff and visitors to change into and out of protective clothing as needed.

Suppliers shall provide change rooms for employees engaged in handling or processing operations in which clothing can be soiled. Where required, Suppliers shall provide a sufficient number of showers for employees use.

Suppliers shall make provisions for the laundering of clothing worn by employees engaged in handling or processing operations in which clothing can be soiled.

Suppliers should provide lunchroom facilities located away from food contact and handling zones. Suppliers should assure lunchroom facilities are:

- Ventilated and well lit
- Provided with adequate tables and seating for the maximum number of employees at one sitting
- Equipped with a sink serviced with hot and cold potable water
- Equipped with refrigeration and heating facilities enabling employees to store, heat, and prepare food and non-alcoholic beverages

#### a. Hand Washing Facilities

Suppliers shall provide hand washing facilities adjacent to all employees access points and in accessible locations (*e.g.*, restrooms, break rooms) throughout the food handling and processing areas as needed. Suppliers providing microbiologically sensitive materials to ConAgra Foods shall position hand washing facilities at all entrances to food processing and handling areas.

Suppliers shall use hand wash basins constructed of stainless steel or similar non-corrodible materials. At a minimum, Suppliers should supply hand washing facilities with:

- A potable water supply
- Hands free taps
- Liquid soap in a fixed dispenser
- Paper towels in a hands free, cleanable dispenser or hand dryers
- A means of containing used paper towels, if used



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 25 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Hand sanitizers

Suppliers shall display signs in appropriate languages advising employees to wash their hands in prominent positions adjacent to hand washing facilities.

#### b. Sanitary Facilities

Suppliers shall design, construct, and locate sanitary facilities so they are easily accessible to employees and separate from any processing and food handling operations. Suppliers shall design toilet rooms so they are not directly accessible from any processing or food handling areas, cater to the maximum number of employees, and are easily cleaned and maintained. Suppliers shall direct sanitary drainage to a septic tank or sewage system without connections to any other drains within the premises.

### 3. Building and Equipment Design and Construction

#### a. Property Location

Buildings, operations, and land use adjacent to and adjoining the property shall not interfere with the safe and hygienic operations of the plant. Suppliers shall validate, monitor, and periodically review the efficiency and effectiveness of measures established to maintain a suitable external environment (e.g., GMP inspections).

Suppliers shall maintain the grounds and area surrounding the building to minimize dust and prevent the accumulation of waste and/or debris to avoid attracting pests and vermin. Suppliers shall seal or otherwise surface, drain, and/or grade roadways and loading and unloading areas to prevent standing water.

- *Additional Co-Manufacturer Requirements*

Co-manufacturers shall maintain, at a minimum, a 36 inch vegetation free zone around the building.

#### b. Materials and Surfaces

Surfaces and equipment should be designed and constructed of materials that are cleanable and do not contribute to a food safety risk.

#### c. Floors, Drains, and Waste Traps

Suppliers should construct floors using materials that are:

- Smooth, dense, and impact resistant
- Effectively graded and drained
- Impervious to liquid
- Easily cleaned

Suppliers should slope floors to floor drains at gradients sufficient to allow for the effective removal of all overflow or wastewater under normal working conditions.

Suppliers should construct and place drains such that they are easily cleaned and do not present a food safety hazard.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 26 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers should position waste trap systems away from any food handling areas and entrances to the premises.

#### d. Walls, Partitions, Doors, and Ceilings

Suppliers should assure the durable construction of walls, partitions, doors, and ceilings. Suppliers should use smooth materials with a light colored finish that are impervious to liquid for all internal surfaces.

Suppliers should assure wall-to-wall and wall-to-floor junctions are sealed and rounded to allow for easy cleaning and to prevent the accumulation of food debris.

Suppliers should assure ducting, conduit, and pipes are recessed into walls or ceilings, suspended from ceilings to service processing operations, or mounted a sufficient distance from walls or ceilings to facilitate cleaning.

Suppliers should construct doors, hatches, and windows using the same functional requirements for internal walls and partitions. Suppliers should assure the solid construction of doors and hatches. Suppliers should use shatterproof glass in windows.

Suppliers should process and handle food in areas fitted with a ceiling or other acceptable structure constructed and maintained to prevent the contamination of product.

#### e. Stairs, Catwalks, and Platforms

Suppliers should design and construct stairs, catwalks, and platforms in food processing areas such that they do not pose a product contamination or food safety hazard.

#### f. Lighting and Light Fittings

Suppliers should provide sufficient lighting in food processing and handling areas. Suppliers should use lighting of the appropriate intensity to enable employees to carry out processing and inspection tasks efficiently and effectively.

Suppliers should use shatterproof light fittings or light fittings manufactured with a shatterproof covering, fitted with protective covers, and/or recessed into or fitted flush with the ceiling.

#### g. Inspection Area

Suppliers should provide a suitable area within the processing area for the inspection of product, if appropriate. The inspection area should include easy access to hand washing facilities and sufficient lighting intensity to enable as thorough an inspection of product as is required.

#### h. Dust, Fly, and Vermin Proofing

Suppliers should assure external windows, ventilation openings, doors, and other openings are effectively sealed when closed and proofed against dust and pests. Suppliers should position pest control devices to avoid a product contamination risk.

#### i. Ventilation

Suppliers should provide adequate ventilation in enclosed food processing and handling areas.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 27 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers should provide extractor fans and canopies in cooking operations areas and areas that generate a large amount of steam. Extractor fans and canopies should have capture velocities (*i.e.*, airflow) sufficient to prevent condensation build up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust canopy positioned over cookers and steam producing equipment. Suppliers should locate fly proof fans and exhaust vents such that they do not pose a contamination risk. Where appropriate, Suppliers should install positive air pressure systems to prevent airborne contamination.

Suppliers should adequately filter HVAC make up air based on the type of product and area. Suppliers should appropriately filter incoming air for processing areas.

#### *j. Equipment, Tools, Utensils, and Protective Clothing*

Suppliers should design, construct, install, operate, and maintain equipment and utensils to prevent contamination and food safety hazards. Suppliers should assure benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment can be easily dismantled for cleaning and position them such that they do not pose a hindrance to the cleaning of the premises. Suppliers should assure equipment surfaces, including welds, are smooth, impervious, and free from cracks and crevices.

Suppliers should use product containers, tubs, and bins for edible and inedible materials constructed of materials that are non-toxic, smooth, impervious, and readily cleaned. Suppliers should clearly identify product containers, tubs, and bins used for inedible material.

Suppliers should design tubs and totes that are raised and inverted for dumping into hoppers to prevent materials from the wheels or bottom of the pallets from falling into the receiving hoppers.

Suppliers should discharge waste and overflow water from product containers, tubs, bins, tanks, and other equipment directly into the floor drainage system.

Suppliers should use sanitary welds on food contact equipment and containers (*e.g.*, metal vats, tanks, piping, filters) and assure they are designed to minimize food safety risk.

Suppliers should design and maintain a color code program for utensils and tools. The program should include clear separation of dedicated drain cleaning utensils.

Suppliers should provide protective clothing made of non-toxic, easily cleaned materials. Suppliers should provide racks for the temporary storage of protective clothing in close proximity or adjacent to employees access doorways, hand washing facilities, and restrooms. Where applicable, Suppliers should provide racks for the temporary storage of protective equipment when staff leave processing areas (*e.g.*, RTE areas).

Suppliers should make provisions for the effective cleaning of equipment, tools, utensils, and protective clothing. Suppliers should designate suitably equipped areas for cleaning product containers, knives, cutting boards, other utensils, and protective clothing. Suppliers should control these cleaning operations such that they do not interfere with manufacturing operations, equipment, or product. Suppliers should provide racks and containers for storing cleaned utensils and protective clothing as appropriate.

#### 4. Waste Disposal

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 28 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall effectively and regularly remove waste from the premises. If waste is held on site prior to disposal, Suppliers should use a separate storage area, which is suitably fly-proofed and contained to prevent potential food safety and quality hazards. Suppliers should routinely clean and sanitize disposal equipment, bins, and storage areas to avoid attracting pests. During daily, documented hygiene inspections, Suppliers should review waste management.

#### D. Sanitation

##### 1. Sanitation Standard Operating Procedures (SSOP)

Suppliers shall develop and maintain documented SSOPs to assure the cleanliness of food handling and non-food handling equipment and facilities. SSOPs shall include, but are not limited to, the following:

- Documented standard cleaning methods for individual pieces of equipment, utensils, and facility structures
- Verification of cleaning effectiveness (*e.g.*, bioluminescence monitoring or swabbing of food contact surfaces after cleaning, but before sanitizing)
- Tool and maintenance, both preventive and unscheduled, sanitation
- Cleaner and sanitizer chemical control
- Employee hygiene

Where applicable, cleaning methods shall include acceptable ranges for water temperature, chemical concentration, and sanitizer strength. Suppliers should monitor and record sanitizer strength for chemicals not rinsed from food contact surfaces.

##### 2. Master Sanitation Schedule (MSS)

The SSOPs shall include an MSS for all plant equipment and facility cleaning, including other daily activities in place to maintain the cleanliness of the facility. The MSS should address equipment and activities not performed as part of the routine sanitation schedule. Suppliers should include the roof and outside grounds in the MSS or other plant activities (*e.g.*, preventive maintenance programs) to monitor routinely.

The MSS shall identify, but is not limited to:

- Specific equipment and areas to be cleaned and sanitized
- The frequency with which cleaning and sanitation activities occur
- Employees responsible for carrying out cleaning and sanitation activities
- Employees responsible for verifying the effectiveness of the cleaning and sanitation program
- Methods used to clean and sanitize

Suppliers shall document all sanitation activities upon completion.

##### 3. Assurance of Sanitation Effectiveness

Suppliers shall perform and document visual inspections to assure cleaning effectiveness. Suppliers shall also verify cleaning effectiveness (*e.g.*, bioluminescence monitoring or swabbing of food contact surfaces at the end of the cleaning cycle, but before sanitizing) and document or record the results. The program shall address re-

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 29 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

cleaning and documentation of corrective actions when deviations occur. Suppliers shall assure food processing areas, food contact surfaces, equipment, and employees sanitary facilities are clean before production.

Changeovers from an allergen containing product to a non-allergen containing product may require intensified cleaning. In addition, such allergen changeovers may require documented validation in compliance with third-party auditors.

#### 4. Traffic Controls

Suppliers shall mitigate risks posed by employees movement (*e.g.*, on foot, forklifts, hand jacks) between RTE, NRTE, and common areas, where applicable. Suppliers providing microbiologically sensitive materials to ConAgra Foods shall maintain foot sanitizing stations (*e.g.*, footbaths, foamers) and hand washing and sanitizing stations. Suppliers shall develop and maintain a employees and product flow chart as part of their traffic control program.

#### 5. Hygienic Restoration

Suppliers shall develop and maintain a documented program to address hygienic restoration, defined as corrective actions to maintain the hygienic condition of the processing environment and to assure the production of safe, wholesome foods after an event that could compromise food safety (*e.g.*, roof or overhead leaks).

This program shall address immediate and long term actions required to determine potential product impact and prevent potential contamination of the processing area.

Suppliers shall place any product that could have been contaminated by an event that could compromise food safety on hold. Suppliers shall perform environmental monitoring of the area during hygienic restoration.

##### *a. Additional Co-Manufacturer Requirements*

Co-manufacturers shall notify ConAgra Foods if any products manufactured for ConAgra Foods are involved in this type of incident.

#### 6. Construction Site Controls

Suppliers shall develop and maintain a program to manage construction events to mitigate food safety hazards.

#### 7. Pest Elimination Program

Suppliers shall develop and maintain a documented integrated pest elimination program designed to prevent pest activity within the building and the surrounding area. The program shall include, but is not limited to:

- Supporting documentation indicating trap and bait station locations
- Chemical use and storage

Licensed Pest Control Operators (PCOs) or trained employees shall document each inspection, complete with pest activity, and immediately address deficiencies with corrective actions. Suppliers shall document deficiencies and all corrective actions.

Pests may include, but are not limited to:

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 30 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Insects
- Rodents
- Birds
- Reptiles
- Other animals

At a minimum, the program should cover all interior and exterior locations and include:

- The applicator's license and insurance
- List of chemicals used
- Quantity of pesticides applied
- MSDS for each chemical
- Chemical application log
- Pest activity log
- Map of all pest control devices

Suppliers should train employees to increase awareness of the pest elimination program and actions that should be taken if employees come into contact with elements of the pest elimination program (e.g., bait stations, traps, pesticide application).

#### 8. Chemical Approval and Control

Suppliers shall develop and maintain a chemical approval and control program to assure the safe use and storage of chemicals, including those used in the pest elimination program. The program shall assure only approved food grade chemicals are used in food and food contact packaging material production.

Suppliers shall maintain a chemical inventory and shall make MSDS sheets and labels available for all chemicals used in the facility.

Suppliers shall store chemicals in a restricted/locked area vented to the outside and accessible only by trained employees. Suppliers shall label, store, and dispose of chemicals in compliance with all applicable federal, state, and local laws and regulations.

Suppliers shall not reuse empty chemical containers. Suppliers shall label and securely store empty containers prior to collection.

Suppliers shall store unused and/or obsolete chemicals under secure conditions while waiting for authorized disposal by an approved Supplier.

Suppliers shall lubricate equipment located over product or product conveyors with food grade lubricants. Suppliers shall use non-toxic paint in food handling areas and only on non-food contact surfaces. Suppliers shall maintain physical separation of food grade and non-food grade lubricants in storage areas and cabinets to prevent potential contamination. Suppliers shall clearly label grease guns for food grade or non-food grade lubricants.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 31 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### 9. Material Safety Data Sheets (MSDS)

Suppliers shall provide MSDS for all materials provided to ConAgra Foods upon request. If an MSDS is not appropriate for the material provided to ConAgra Foods, Suppliers shall provide a letter explaining the regulatory rationale used to determine that an MSDS is not required. Suppliers shall routinely review and maintain MSDS documents for accuracy based on currently available science and regulatory guidance. If a significant change is made to an MSDS that may have direct implication for ConAgra Foods employee safety, Suppliers shall notify ConAgra Foods in writing of the change.

### E. Prerequisite Programs

#### 1. Identity Preserved Products

Suppliers shall develop and maintain a program for the identification and processing of identity preserved products. Identity preserved products claim special attributes and require segregation and proper labeling to prevent comingling with other products and raw materials that do not have the same attributes (e.g., Kosher, Halal, and organic products, genetically modified organisms (GMO), and products with allergens or sensitive ingredients). Suppliers shall assure the declaration of the identity preserved status of products complies with all applicable federal, state, and local laws and regulations.

Suppliers shall retain a statement of the status claimed by all identity preserved products, including, but not limited to, finished products, raw materials, ingredients, preservatives, additives, processing aids, and flavorings. Raw material specifications for identity preserved products shall include requirements for their handling, transport, storage, and delivery prior to use. Finished product specifications for identity preserved products shall include requirements for their handling, transport, storage, and delivery and any additional customer requirements concerning identity preserved products.

The program shall assure the identity preserved status of products is maintained from receipt of ingredients through manufacture and shipping of finished products. Suppliers shall physically separate identity preserved products from ingredients identified as incompatible with the identity preserved product. Suppliers should complete processing of identity preserved products in a separate room, on the first production run, or after completion of a thorough sanitation of the area and equipment. Suppliers should store and transport identity preserved products in separate units or isolated by a physical barrier from other products and ingredients.

#### 2. Allergens and Sensitive Ingredients

Suppliers shall provide information for each material supplied to ConAgra Foods indicating allergens and sensitive ingredients present in the material and in the Suppliers' facilities.

The FDA identifies and controls this list of major food allergens under direction of the Food Allergen Labeling and Consumer Protection Act (FALCPA):

- Eggs
- Fish
- Milk
- Peanuts\*

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 32 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Crustacean/shellfish
- Soy\*
- Tree Nuts
- Wheat

\*In accordance with FALCPA, ConAgra Foods considers the refined, bleached, and deodorized oils derived from these foods non-allergenic.

In addition to the allergens identified by FALCPA, ConAgra Foods also complies with Canada’s CFIA and manages the following ingredients as allergens and requires their disclosure when used:

- Molluscan Shellfish
- Sesame
- Mustard
- Non-wheat gluten-containing ingredients, such as rye, barley and their derivatives

Depending on the final destination, ConAgra Foods may also require Suppliers to address sulfites and other sensitizing agents in their allergen control programs. Suppliers shall comply with all applicable laws and regulations, including those in the country of origin and the destination country of the finished product manufactured using these materials.

Suppliers shall develop and maintain an allergen and sensitive ingredient control and training program. The program shall direct employees in assessing where and how allergens and sensitive ingredients are received, stored, and handled. The program shall meet the requirements outlined in FALCPA and comply with all laws and regulations applicable to the material’s manufacture and final destination (*i.e.*, country of manufacture and destination country of the finished product manufactured using the material). The program shall also identify potential avenues for cross-contamination, including, but not limited to, the following:

- Rework
- Trimming
- Reprocessing
- Equipment cross contact

Suppliers shall identify and communicate to relevant staff the raw materials containing allergens. Suppliers shall address the hazards associated with allergens and their control in the Food Safety Plan. Suppliers shall verify the effectiveness of cleaning and sanitation conducted between changeovers to assure it is effective and sufficient to remove all potential allergens from contact surfaces to prevent cross contamination. Where satisfactory line hygiene, cleaning, sanitation, or segregation are not possible, Suppliers shall use separate equipment to process allergens.

#### *a. Additional Co-Manufacturer Requirements*

Co-manufacturers shall maintain a schedule matrix to control allergen cross contamination in the facility with full sanitation conducted between allergen runs.

### 3. Environmental Monitoring Program (EMP)



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 33 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers manufacturing microbiologically sensitive materials for ConAgra Foods shall develop and maintain a pathogen environmental monitoring program. The program shall identify the presence and extent of potential pathogens in the plant environment and describe appropriate corrective actions, as needed, to assure the elimination of potential pathogens from the plant environment.

At a minimum, the program shall define:

- How sampling sites are selected
- Target microorganism(s)
- Frequency of sampling
- Method of sampling
- Testing methodology
- Specification limits
- Corrective actions to be followed if a positive result is found

Site selection should take into account traffic and product flow within the production environment, sanitary design of the equipment and facility, and potential pathogen harborage sites. Sampling plans should include floor drains located in relevant areas. Routine sampling must occur during normal operating (production) hours when materials are being manufactured. Site descriptions for each sample should enable clear correlation to the sampling site within the plant environment.

Laboratories performing the testing shall demonstrate the ability to provide accurate and valid results using AOAC/ISO methodologies or current methods of the U.S. FDA or USDA.

In the event of a positive result in the plant environment, corrective actions shall include an investigation to determine the likely source, measures taken to eliminate the pathogen from the environment (*e.g.*, cleaning and sanitation), and mechanisms to verify the effectiveness of the corrective actions. Corrective actions shall include no less than three (3) consecutive days of follow up swabs taken at the site from which the original positive result was obtained and vector swabbing around the site. Suppliers shall analyze positive findings over time to identify potential trends and determine if further corrective actions are needed.

Suppliers shall verify and document compliance to the environmental monitoring program at least quarterly. Suppliers shall also review the environmental monitoring program when changes occur to the process or product (*e.g.*, new equipment installation, modification of a material, or introduction of a new material). Suppliers shall re-validate their lethality process, if applicable, each time the environmental monitoring process changes or at least annually.

#### 4. Equipment Calibration

Suppliers shall develop and maintain a documented calibration (certification) program to evaluate the performance of operational measuring devices (*e.g.*, metal detectors, thermometers). The program shall include documentation of corrective actions to address the use of a non-calibrated or inaccurate measuring device.

Suppliers shall use appropriate calibration standards and methods. If standards are not available, Suppliers shall provide evidence to justify the accuracy of the calibration method used. At a minimum, Suppliers shall perform

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 34 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

calibrations per regulatory requirements or manufacturer recommended schedules. The program should include an all-inclusive master calibration list with frequency and due date of next calibration.

#### 5. Foreign Material Prevention and Control

Suppliers shall develop and maintain programs for foreign material prevention and control. The program shall describe maintenance, set-up, verification, and frequency of testing for all foreign material prevention and/or detection devices used by the Supplier. The program shall include guidelines for the prevention of contamination and disposition of materials with suspected or known contamination. Suppliers shall maintain documentation of foreign material findings with root cause and corrective actions.

All materials manufactured for ConAgra Foods shall undergo a foreign material prevention and/or detection step appropriate for the process and material in question (*e.g.*, x-ray, metal detectors, filters, screens). Sensitivity (*e.g.*, detection limits, screen sizes, magnet strength) of the foreign material prevention and/or detection step shall be appropriate for the process and material in question. Suppliers shall optimize the degree of detection, prevention, and mitigation based on the best available technology for the specific application.

Foreign material, also referred to as extraneous material, is any material not intended to be part of the finished product, including, but not limited to, the following:

- Bone
- Cloth
- Dirt
- Feathers
- Glass
- Hair
- Insect parts
- Metal
- Paper
- Plastic
- Rocks
- Rodents
- Rust
- Stems
- Wood

Foreign material control measures prevent and/or detect foreign material and include, but are not limited to, the following:

- Destoners
- Filters
- Magnets
- Metal detectors
- Screens

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 35 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Sieves
- Sifters
- X-ray

Suppliers shall develop and maintain a program to control glass and hard/brittle plastic. The program shall identify equipment and other areas containing glass and hard/brittle plastic. The program should restrict the use of glass and hard/brittle plastic devices and supplies. Facilities packing materials in glass shall properly clean the containers and provide shielding to protect materials and ingredients in the event of glass or hard/brittle plastic breakage during production.

Suppliers should assure wood pallets used in food handling and processing zones are clean and in good repair. Suppliers should remove or tightly fix loose metal objects on equipment and overhead structures to prevent foreign material contamination.

#### a. Additional Co-Manufacturer Requirements

Co-manufacturers shall conduct routine inspections of the premises and equipment to assure it remains in good condition and does not pose a potential foreign material contamination risk to the product. Co-manufacturers shall isolate, clean, and thoroughly inspect any area in which glass or hard/brittle plastic breakage occurs prior to the commencement of operations

Co-manufacturers shall take measures including, but not limited to, the following to prevent foreign material contamination:

- Routinely monitor metal or other physical contaminant detectors (*e.g.*, x-ray) for operational efficiency
- Fit metal or other physical contaminant detectors with devices to indicate when a foreign object is detected and rejection devices to isolate affected product
- Develop and document a program to set up, test, and calibrate metal detectors to detect ferrous (Fe), non-ferrous (non-Fe), and stainless steel (SS)
- Clean magnets according to the MSS
- Perform pull tests on magnets at least annually, assuring magnet strength is within 10% of design
- Inspect screens and/or filters used to remove foreign material at a frequency that maintains their effectiveness
- Protect materials, including raw materials, WIP, and finished products, with tight fitting lids, covers, or shields prior to packaging

#### 6. Maintenance

Suppliers shall develop and maintain a program to assure maintenance is performed in a manner that minimizes the risk of product, packaging, or equipment contamination. The program shall include, but is not limited to, preventive maintenance, installation, and repairs. Suppliers should maintain a preventive maintenance schedule to cover building, equipment, and premises critical to food safety and quality.

Maintenance employees shall account for tools and remove debris when work is completed. The program shall include procedures to guard against contamination due to line maintenance work. Maintenance employees shall

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 36 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

not use string, wire, or tape to fix or hold equipment as part of a temporary repair. In the event that duct tape or plastic is used as a temporary repair pending permanent repair, Suppliers shall date the tape or plastic, associate a work order with the repair, and maintain the temporary repair in a sanitary condition. Under no circumstances may temporary repairs be used long term.

Suppliers shall provide dedicated maintenance tools for use in the RTE area, where and when appropriate. All contractors and Suppliers shall meet the requirements of the GMP program while working on the premises.

Maintenance employees shall inform management if repairs and/or maintenance poses a potential threat to product safety. Suppliers shall develop, maintain, and implement programs to prevent the operation of equipment after maintenance activities before cleaning and sanitizing said equipment. Management shall take appropriate measures to protect product, which may include performing repairs outside processing times.

#### 7. Utilities Management

Suppliers shall develop and maintain effective programs for the management and control of the following utilities:

##### a. *Water*

The potable water supply system, including ice and water in contact with the product, as an ingredient, and used to clean equipment, shall meet all applicable federal, state, and local laws and regulatory requirements. Suppliers shall develop and maintain effective programs to control microbiological quality of water and to verify that water meets specified requirements. The program should include regular monitoring to assure it remains effective.

Suppliers shall provide supplies of hot and cold water as required to enable the effective cleaning of the premises and equipment.

Suppliers shall assure delivery of water within the premises is not contaminated. Microbiological quality of water used as an ingredient or for sanitation rinse shall be tested at the point of use at an established and appropriate frequency to assure that hoses and/or piping are not potentially contaminated. Sampling and testing sites should be rotated to assure complete monitoring.

Suppliers shall control the use of non-potable water such that:

- There is no cross contamination between potable and non-potable water lines
- Non-potable water piping and outlets are clearly identified
- Back-flow devices (*i.e.*, non-return devices) are installed in non-potable water lines to prevent back flow

Suppliers shall store ice to minimize contamination of the ice.

Suppliers shall design, install, and operate water treatment (*e.g.*, boilers, softeners) methods, equipment, and materials to assure water receives an effective treatment.

##### b. *Steam*

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 37 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Suppliers shall use steam of the correct quality and purity to meet process and usage needs. Process steam is suitable for indirect use during processing or for direct contact with product surfaces with a subsequent rinse.

Culinary steam or clean steam is suitable for direct product contact and direct injection into materials and/or primary packaging. Suppliers shall use two filters on culinary steam: first, a 10 micron filter, followed by a 2.0 micron filter. The 2.0 micron filter and all distribution piping after the filter shall be corrosion resistant (*e.g.*, stainless steel). Food grade chemical treatment for boilers shall be used to generate culinary steam.

Appropriate employees shall trend and review microbiological and other test data from water and air testing and initiate corrective actions for out of standard results.

*c. Air*

Room air shall not provide a source of microbiological contamination. Where relevant, Suppliers shall monitor room air to assure suitable quality. Suppliers shall monitor the microbiological quality of air in production areas with exposed microbiologically sensitive materials that do not receive a subsequent kill step.

*d. Compressed Air*

Suppliers shall assure compressed air used for general applications is dry, oil free, and filtered to remove foreign particles. When using compressed air as an ingredient or in contact with microbiologically sensitive materials, packaging, or product contact surfaces (*e.g.*, during cleaning), Suppliers shall filter the compressed air on point of use and dry it to prevent condensation within pipelines.

Suppliers shall filter compressed air used on products and/or product contact surfaces at 0.3 microns to prevent contamination. The filter shall be less than 25 feet from the point of use, but should be as close as possible to the point of use. Compressed air distribution after the 0.3 micron filter shall only be used on product or product contact surfaces and shall not supply other pneumatic operations. The filter and all downstream air piping shall be corrosion resistant (*e.g.*, stainless steel).

If oil lubricated compressors are used for product and/or product contact surfaces, the air distribution system shall have oil and oil vapor filters installed before the air comes into contact with products and/or product contact surfaces.

## VII COMPLIANCE

### A. Lab and Test Methods and Validation

Suppliers shall develop and maintain a documented program to address how records and reports of analytical information are gathered by the facility and/or outside laboratories, documented, and retained. The program shall document laboratory testing methods based on recognized and approved methods and procedures (*e.g.*, AOAC, AACC, APHA, BAM, USDA). Suppliers shall verify the program with documented evidence that the test

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 38 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

results are accurate and reliable, checking sample programs and including calibration of instruments and measuring devices.

Suppliers shall develop and maintain a defined analytical program for testing in process and finished goods. The program should define a sampling plan, tests, test methods, and record keeping and should cover both in-house and third party testing.

Suppliers shall develop and maintain a finished product retention program to assure that, in the event a finished good requires additional evaluation during its shelf life, samples of the materials are available.

#### 1. Laboratories

Suppliers shall design, equip, calibrate, and maintain laboratory facilities and equipment appropriately to yield accurate and precise results without potential of contaminating production areas with physically and administratively controlled access.

Suppliers shall design on-site laboratories to limit access only to authorized employees and display signage identifying the laboratory as a restricted area accessible only by authorized employees. Laboratory staff shall have documented qualifications by way of specific training, certification, or other forms of credentialing.

Suppliers shall locate on-site laboratories separate from food processing and handling activities. Suppliers shall implement Good Lab Practices (GLPs) and assure they are understood by all laboratory staff.

Suppliers shall make provisions to isolate and contain all laboratory waste held on the premises. At a minimum, Suppliers shall place laboratory waste water outlets downstream of drains that service food processing and handling areas. Suppliers shall autoclave or disinfect waste from microbiological testing prior to disposal.

## B. State and Federal Laws and Regulations

#### 1. Regulatory Status

Suppliers shall provide only materials legally marketable for use in the U.S., Canada, and other countries as requested by ConAgra Foods. Suppliers shall maintain appropriate documentation to verify the regulatory status of all materials provided to ConAgra Foods.

Appropriate documentation may include, but is not limited to, GRAS conditions for use statement, a third party opinion, or a Code of Federal Regulations (CFR) reference. In all cases, Suppliers shall maintain this documentation and keep it up to date during the entire time the material is provided to ConAgra Foods.

Suppliers shall provide regulatory documentation certifying the legal status of materials immediately upon request by ConAgra Foods and make this documentation available to ConAgra Foods, third party, and regulatory auditors as needed.

#### 2. Regulatory Compliance

Suppliers shall comply with all applicable federal, state, and local voluntary and required laws, regulatory programs, and rules.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 39 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### 3. Reduction of Toxics in Packaging

Packaging and packaging components provided to ConAgra Foods or its subsidiaries, suppliers, or co-manufacturers and/or utilized in the manufacture of products for ConAgra Foods shall comply with all applicable laws and regulations of the country of origin and destination country with consideration for the intended food type and condition of use.

Suppliers shall assure that packaging and packaging components comply with regulations that require the sum of incidental concentration levels of lead, mercury, cadmium, and hexavalent chromium to not exceed 100ppm by weight. Suppliers shall obtain the same written assurances from their suppliers. Suppliers and their suppliers shall maintain supporting documentation throughout the lifespan of the packaging or packaging component.

#### 4. Quality or Economic Adulterants and Other Chemical Hazards

Suppliers shall provide materials that are not adulterated in any way, either accidentally or intentionally, and are of high quality and implicit safety. Suppliers shall develop and maintain programs to assure the quality of materials. The program shall assure materials comply with:

- U.S. and Canadian regulations and Codex for heavy metals unless otherwise specified and approved by ConAgra Foods.
- EPA pesticide tolerance levels or maximum residue limits (MRLs) for foods marketed in the U.S.
- Tolerance limits levels for veterinary residues, hormones, and growth stimulants, where applicable.
- Mycotoxin limits, where applicable.

Suppliers shall develop and maintain an ongoing chemical management policy to assure potential chemical adulterants and reasonably anticipated chemical contaminants are monitored and remain within regulatory requirements and, as appropriate, ConAgra Foods specifications. ConAgra Foods reserves the right to periodically test any materials for chemical contaminants including economic adulterants.

#### 5. Proposition 65

Suppliers providing material containing a chemical or chemicals listed by the State of California pursuant to the Health and Safety Code Section 25249.5 et. sec. (commonly called "Proposition 65") shall notify ConAgra Foods in writing of the material name, listed chemical(s) involved, expected concentrations, and the warning statement the Supplier provides with the material. If the material is not expected to contain such chemicals at a concentration requiring a warning, Suppliers should provide a statement to that effect.

### C. **Quality Policies and Procedures**

Suppliers shall develop and maintain specific programs as part of an overall food safety and quality system to assure the materials provided:

- meet all specifications, standards, and requirements established by ConAgra Foods
- conform to all applicable federal, state, and local laws and regulations and industry standards
- are free from any physical, chemical, or biological hazards

At a minimum, Suppliers' food safety and quality system shall comply with GFSI standards and include:

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 40 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Food supply chain security
- GMPs
- SSOPs
- HACCP
- Environmental monitoring procedures (EMP)
- Allergen and sensitive ingredient control
- Pest elimination
- Foreign material prevention and control
- Receiving and inventory management
- Product and process evaluation
- Product traceability and mock recalls
- Packaging and labeling
- Storage and shipping
- Analytic records and laboratory support
- Employee training

ConAgra Foods shall evaluate Suppliers' processes and products on a regular basis. ConAgra Foods reserves the right to conduct site visits as a part of our evaluation, with the goal of continual improvement.

#### D. Audits

##### 1. Internal Audits

Suppliers shall establish and maintain documented auditing methods and identify employees responsible for scheduling and conducting internal audits to verify the effectiveness of the food safety and quality system, including factory and equipment inspections, prerequisite programs, food safety plans, and legislative controls.

Suppliers should prepare an internal audit schedule detailing the scope and frequency of internal audits. Internal audits should include, but are not limited to, staff amenities, product and process controls, sanitation, detection of foreign materials, and employees hygiene practices.

Suppliers shall communicate audit results to relevant management employees and staff responsible for implementing and verifying corrective actions. Suppliers shall document all deficiencies, investigations, resolutions, and corrective actions resulting from internal audits.

Suppliers shall train all employees conducting internal audits on internal audit procedures. Whenever possible, employees conducting internal audits should be independent of the function being audited (*i.e.*, no cross functional teams should perform audits).

##### 2. Third Party Audits

ConAgra Foods performs audits and uses third party audits conducted by industry recognized companies to verify that our Suppliers' food safety and quality systems are designed properly and are functioning in compliance with applicable regulatory and industry standards. Suppliers should post third party audit results,



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 41 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

complete with documented corrective action, on iCiX and give ConAgra Foods appropriate reader rights to the documents.

Our preferred audits are those benchmarked by the GFSI board and performed by an accredited, certified auditor. ConAgra Foods may accept other auditing agencies on a case by case basis.

#### E. Certification

Suppliers shall comply with certifying organization requirements of the certifying body on the final ConAgra Foods product. Certifying organizations include, but are not limited to: Kosher, Halal, Organic,

## VIII CONTINUOUS SKILLS DEVELOPMENT

#### A. Employee Training

Suppliers shall develop and maintain a documented employee training program to assure regular training on food safety and quality. Suppliers shall provide training that includes, but is not limited to:

- GMPs
- Prerequisite programs
- Allergen control
- Food defense
- Food regulatory requirements
- Critical steps identified by the hazard analysis and other instructions critical to implementation and maintenance of the Food Safety Program
- Food safety system

Suppliers shall determine the necessary competence for employees performing work affecting food safety, food defense, and product quality across all functions that come into contact with the materials. Suppliers shall train new and temporary employees before they begin working in production. The training program shall include refresher training.

Suppliers shall assure at least one individual at each facility is HACCP certified (*i.e.*, through a course certified by the International HACCP Alliance or other widely recognized organization). Employees monitoring, verifying, or validating CCPs and/or CQPs shall receive specific training that demonstrates and documents their competency and ability to conduct the required activities.

Suppliers shall maintain a master training record for all employees. The master training record should include, but is not limited to:

- Participant name and title
- Skills description

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 42 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Description of the training provided
- Date training completed
- Trainer or training provider
- Verification of training completion and trainee competency

Suppliers shall develop, maintain, and make available standard procedures and/or work instructions for tasks critical to meeting customer specifications and ensuring food safety and quality. Suppliers shall deliver training and training materials in languages understood by all employees.

## IX CONTINUOUS IMPROVEMENT

Suppliers shall develop and maintain a documented system for the review and retention of all records related to the receipt, manufacture, and shipment of materials for ConAgra Foods. Suppliers should utilize continual improvement methods to evaluate processes with documented measurements indicating the level of performance (*e.g.*, statistical process control, trend analysis).

## X APPENDIX A: DEFINITIONS AND ABBREVIATIONS

21 CFR §110	Title 21 Food and Drugs; Code of Federal Regulations; Chapter I Food and Drug Administration, Department of Health and Human Services; Subchapter B Food for Human Consumption; Part 110 Food Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food
21 CFR §113	Title 21 Food and Drugs; Code of Federal Regulations; Chapter I Food and Drug Administration, Department of Health and Human Services; Subchapter B Food for Human Consumption; Part 113 Thermally Processed Low-Acid Foods Packaged in Hermetically Sealed Containers
21 CFR §114	Title 21 Food and Drugs; Code of Federal Regulations; Chapter I Food and Drug Administration, Department of Health and Human Services; Subchapter B Food for Human Consumption; Part 114 Acidified Foods
21 USC §321	Title 21 Food and Drugs; United States Code; Chapter 9 Federal Food, Drug, and Cosmetics Act; Subchapter II Definitions; Section 321 Definitions
42 USC §6903	Title 42 The Public Health and Welfare; United States Code; Chapter 82 Solid Waste Disposal; Subchapter I General Provisions; Section 6903 Definitions
49 USC §5102	Title 49 Transportation; United States Code; Subtitle III General and Intermodal Programs; Chapter 51 Transportation of Hazardous Material; Section 5102 Definitions
9 CFR §381.300-309	Title 9 Animals and Animal Products; Code of Federal Regulations; Chapter III Food Safety and Inspection Service, Department of Agriculture; Subchapter A Agency Organization and Terminology, Mandatory Meat and Poultry Products Inspection and Voluntary Inspection and Certification; Part 381 Poultry Products Inspection Regulations; Subpart X Canning and Canned Products
AOAC	Association of Official Analytical Chemists
APHA	American Public Health Association
BAM	FDA's Bacteriological Analytical Manual
Bioterrorism Act of	Public Health Security and Bioterrorism Preparedness and Response Act of 2002

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 43 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

2002	
BRC	British Retailers Consortium, a GFSI standard
BSE	Bovine Spongiform Encephalopathy
Calibration	Confirmation of standardization of a measurement device or system against a known reference
CARs	Corrective Action Requests; Nonconformance and Corrective Action Response System in iCiX
CBP	Customs and Border Protection
CCP	Critical Control Point
CDP	Carbon Disclosure Project
CFR	Code of Federal Regulations
COA	Certificate of Analysis
Codex	Codex Alimentarius Commission
Co-Manufacturer	A third party that manufactures or packages a ConAgra Foods labeled finished product or component under a purchase order, supply agreement, or contract
Component Materials	A unit that contains a product or ingredient to be used by the consumer when preparing the finished product
CQP	Critical Quality Point
C-TPAT	Customs-Trade Partnership Against Terrorism
EMP	Environmental Monitoring Program
EPA	Environmental Protection Agency
FALCPA	Food Allergen Labeling and Consumer Protection Act
FDA	Food and Drug Administration
Finished Product	Item purchased by ConAgra Foods from a Supplier
FSIS	Food Safety and Inspection Service
FSSC2200	Food Safety Certification 2200
GFSI	Global Food Safety Initiative
GLP	Good Laboratory Practice
GMO	Genetically Modified Organisms
GMP	Good Manufacturing Practice
HACCP	Hazard analysis critical control points
High Risk Processes	A product in which there is the potential for metal contamination and where metal detection of the finished product is not possible
HVAC	Heating, Ventilation and Air Conditioning
Hygienic Restoration	Corrective actions to maintain the hygienic condition of the processing environment and to assure the production of safe, wholesome foods, after an event that could compromise food safety (e.g., roof or overhead leaks)
iCiX	International Compliance Information Exchange
Ingredient	A raw material, incidental additive, or processing aid used to manufacture a finished product
ISO	International Organization for Standardization
Legality	national, federal, state, and local regulations in the country of manufacture and intended markets
LTL	Less than truckload

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 44 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Materials	Any raw material, ingredient, packaging material, incidental additive, or processing aid that is used as part of the manufacturing process
MAV	Maximum Allowable Variation
MIG	Mercury in Glass thermometer
MRL	Maximum Residue Limit
MSDS	Material Safety Data Sheet
MSS	Master Sanitation Schedule
NACMCF	National Advisory Committee on Microbiological Criteria for Foods
NIST Handbook 133	National Institute of Standards and Technology Handbook 133: Checking the Net Contents of Packaged Goods
NRTE	Not Ready to Eat; also Ready to Cook (RTC)
Packaging	Packaging or containment devices that come in contact with the finished product and/or the finished product shipping case or tray.
PAS ISO 17712	International Organization for Standardization's Publicly Available Specification 17712
PCO	Pest Control Operator
Potable Water	Fit or suitable for drinking; water supplies that have been tested and determined to meet or exceed the appropriate health authority standards for drinking water
Proposition 65	Health and Safety Code Section 25249.5 et. sec.
Raw Material	An ingredient, incidental additive, or processing aid used to manufacture a finished product
Rework	Any combination of components or work-in-process that is held for later use from when it was originally combined, processed or manufactured
RTC	Ready to Cook; also Not Ready to Eat (NRTE)
RTE	Ready to Eat
Sanitary Food Transportation Act of 1990	49 USC §5701 et. seq.; Title 49 Transportation; United States Code; Chapter 57
SQF	Safe Quality Food, a GFSI standard
SSOP	Sanitation Standard Operating Procedures
Supplier	Any company that delivers materials or services to a ConAgra Foods site also referred to as a Supplier, co-packer, re-packer, or licensee
SVI	Status Verification Interface
TSE	Transmissible Spongiform Encephalopathy
USDA	United States Department of Agriculture
Supplier	Suppliers, co-manufacturers, and other quality partners
WIP	Work in Process; Work in Progress

## XI APPENDIX B: CUSTOMS-TRADE PARTNERSHIP AGAINST TERRORISM (C-TPAT) PROGRAM

### 1. Policy

Provider shall meet the minimum requirements for compliance with the Customs-Trade Partnership Against Terrorism (C-TPAT) program regulating the flow of product from point of origin through point of distribution.

### 2. Mandatory Requirements

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 45 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- a. If C-TPAT certified Provider must provide ConAgra Foods with written documentation (C-TPAT) certificate and program SVI number). If Provider is not C-TPAT certified, Provider must agree to participate in ConAgra Foods' C-TPAT process, to include submission of a security self-assessment and on-site security audits conducted by representatives of ConAgra Foods.
- b. Provider must have a security management program in place to effectively assure cargo and product security. The security management program must include; ensuring that all sub-contractors used to handle, store or transport ConAgra Foods product have implemented minimum C-TPAT standards; a process to notify Customs and/or law enforcement of any illegal or suspicious activity; and a training program to educate employees on how to recognize, handle and report threats and vulnerabilities to the facility.
- c. Provider must have access controls procedures in place to prevent unauthorized entry to the Warehouse. Access controls must include; the positive identification of all employees, visitors, and Suppliers at all entry points; the verification of all non-employee identities by checking photo identification; a method to easily distinguish between employees and non-employees; a system to control the issuance, removal and modification of all access control devices (keys, key cards, codes, etc.); and a procedure for challenging all unknown/unauthorized persons on warehouse property.
- d. Provider must have physical security measures in place to detect and deter illegal and/or unauthorized activity. Physical security measures must include: having a physical barrier which prevents unauthorized access to cargo holding areas; buildings must be constructed of material which resists unlawful entry and must be inspected periodically and repaired when needed; all external facility access points (doors, docks, windows); roof access must have locking devices and must be secured at all times when not actively in use; having adequate lighting to illuminate cargo handling and storage areas, all entrances and exits, property perimeter fence lines and all parking areas; where perimeter fencing exists, the fence must be inspected periodically and repaired when needed, and all vehicle and employees gates must be manned or monitored.
- e. Provider must have employees security procedures in place to protect people, property and product. Employees security procedures must include; conducting pre-employment screening of applicants which at a minimum must include verifying previous employment and references; and a procedure to assure the removal of all access when employees are terminated, resign, retire or are otherwise no longer employed.
- f. Provider must have cargo and container security procedures in place to deter theft and assure product integrity. Cargo and container security procedures must include; a process to assure information on inbound shipments is received in a timely manner; a process to assure all outbound shipment documentation is legible, complete, accurate, and protected against data being lost and/or altered; access to automated shipping/receiving documentation systems must be limited and controlled; a procedure for investigating and resolving all OS&D shipments; a procedure to inspect the physical integrity of containers prior to stuffing; written container seal procedures which must include how seals are to be affixed, requiring that all container doors be sealed, and the use of high-security PAS ISO 17712 compliant seals for all international shipments; and ensuring that all containers not actively being loaded or unloaded are stored in a secure area and individually secured to neutralize unauthorized entry.
- g. Provider must have information technology security procedures in place to prevent unauthorized access to automated systems. Information technology security procedures must include: the use of individually assigned accounts with passwords which must be changed periodically; a method to detect improper access,

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 46 of 49	

file tampering, or the altering of business data; and a process for taking appropriate disciplinary action for system abuse.

#### 3. Recommended Standards

In addition to the mandatory C-TPAT requirements outlined above, the following security measures and procedures are recommended program standards:

- a. In the area of security management; all procedures and processes covered by this program should be in writing; close relationships should be developed with law enforcement, fire departments and other emergency responders; security program self-assessments should be conducted annually; additional security training should be provided to mail screeners as well as internal conspiracy training for shipping/receiving employees; consideration should be given to implementing incentive programs for employees who report threats, vulnerabilities and illegal or suspicious activities.
- b. In the area of access controls; employee access should be limited to those areas required for their duties; visitors should be escorted and display temporary identification; and incoming mail and packages should be screened for suspicious content prior to being distributed.
- c. In the area of physical security; property perimeter fencing is encouraged; where perimeter fencing exists, the number of gates should be kept to a minimum; fencing should be used within the warehouse to segregate domestic, international, high-value and hazardous cargo; alarm and/or CCTV systems are encouraged to monitor premises and prevent unauthorized access to product handling and storage areas; and private vehicle parking should be segregated from cargo handling and storage areas.
- d. In the area of employees security; pre-employment screening on applicants should include criminal history checks; and periodic reinvestigations should be conducted for cause and for employees working in sensitive positions.
- e. In the area of cargo and container security; all shipment documents should accurately describe weights, labels, marks and piece counts for verification; all inbound and outbound shipments should be reconciled against shipping documents; all trucks and drivers entering the property should be logged; drivers should be prohibited from entering cargo handling areas without being escorted or monitored; access to and distribution of container seals should be limited to those required for their duties; and a seven-point (front wall, left side, right side, floor, ceiling/roof, inside/outside doors and outside undercarriage) inspection process should be used to verify the integrity of containers prior to stuffing.

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 47 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

## XII APPENDIX C: THERMAL PROCESSING

### 1. Thermal Processing

Suppliers supplying thermally processed foods (*i.e.*, high and low acid foods) shall comply with all applicable ConAgra Foods policies and procedures and federal, state, and local laws and regulations, including:

- 21 CFR§110 (FDA) Current GMP in Manufacturing
- 21 CFR§113 (FDA) Thermally Processed Low-Acid Foods Packaged in Hermetically Sealed Containers
- 21 CFR§114 (FDA) Acidified Foods
- 9 CFR§318.300-311 and §381.300-311 (USDA) Meat and Poultry products

Suppliers shall develop and maintain documented programs to assure the finished products are commercially sterile (*i.e.*, shelf stable). Suppliers shall maintain all production and processing records.

The thermal processing programs shall include, but are not limited to, the following:

#### a. *Closing and Seaming Equipment*

Suppliers shall install, maintain, and operate, including set up, closing (*i.e.*, seaming) or sealing machines for containers to assure:

- Finished containers meet seam/seal specifications
- Refurbishing of closing and seaming equipment complies with the manufacturer's specifications

#### b. *Seam and Seal Integrity*

A competent person trained in evaluating container seam and seal integrity shall:

- Conduct visual and seam tear down inspections at frequencies that comply with FDA and USDA guidelines
- Maintain records of all seam and seal evaluations and any corrective actions taken

#### c. *Sterilizing Equipment (i.e., Retorts)*

Suppliers shall install, maintain, and operate sterilizing equipment to assure:

- Product in each container receives the minimum sterilizing requirements
- The heating medium is delivered uniformly to all containers and is validated with heat distribution studies
- Sterilizing equipment is equipped with:
  - Pressure gauge
  - Temperature indicating device or mercury-in-glass (MIG) thermometer easily readable to 1.0°F (0.5°C)
  - Temperature recording device for creating a permanent record of processing times and temperatures
  - Timing device for measuring process times
  - Automatic steam controller to maintain the retort temperature at the specified set point

Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 48 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

#### d. Thermal Processing

Suppliers shall :

- Use only use scheduled processes established by a recognized Process Authority
- Display scheduled processes and venting procedures for each product and retort system in a prominent position in the retort area for use by the operator
- Assure employees are trained to operate or supervise retort operation

#### e. Scheduled Processes

A recognized Process Authority having expert knowledge of thermal processing shall establish scheduled thermal processes. Suppliers should have appropriate facilities and equipment for collecting heat penetration data. Suppliers shall process products based on thermal processes established by the Process Authority. The scheduled process shall include, but are not limited to, the following:

- Product formulation and container type
- Type of sterilizing system
- Process temperature and time
- Initial temperature
- List of critical control factors
  - Size and dimensions of container
  - Product formulation, weight distribution, and viscosity of components
  - Net weight and volume of contents
  - Gross weight of container
  - pH of solid and liquid components
  - Matting/clumping tendency
  - Rehydration of components, where appropriate

Suppliers shall conduct frequent checks of critical factors to assure they are within the limits specified in the scheduled process.

#### f. Process Deviations

The recognized Process Authority shall review records of all thermal process deviations and disposition them using established scientific methods. Suppliers shall review the recommendations of their Process Authority with ConAgra Foods for final disposition of product.

#### g. Record Review

Suppliers shall conduct record review no later than the next working day after processing. Record review shall include, but is not limited to, the review and verification of all relevant production and processing records, tests, and inspections to assure only safe and stable product is shipped into commerce.

#### h. Container Handling

Suppliers shall:

- Use a system for transferring containers to the retort that does not dent or damage the container



Version	01	Document Number	ENQA 4.1.4.002
Revision Date	07.2012	Supersedes	05.2008 v00
Original Issue Date	05.2008	Page 49 of 49	

## Supplier and Co-Manufacturer Expectations Manual

### Food Safety and Quality Systems

- Assure the preliminary cooling is carried out properly (*i.e.*, pressure cooling) to avoid stressing the seam and/or seal or buckling
- Unload retorts and handle processed containers as gently as possible to avoid abuse
- Clean and sanitize the filled container handling system on a regular basis

#### *i. Dud Detectors*

Suppliers shall have a calibrated and functioning dud-detector.

- *Additional Co-Manufacturer Requirements*

Co-manufacturers shall comply with the ConAgra Foods Dud Detection Policy and Procedure.

#### *j. Product Incubation*

Suppliers shall conduct incubation studies following installation of new lines and development of and/or changes to a process, package, or product as deemed necessary by ConAgra Foods. Suppliers may use a qualified third party facility (*e.g.*, universities, outside laboratories) to conduct these incubation studies.

#### *k. Cooling Water*

Suppliers shall:

- Introduce cooling water in a manner that minimizes the risk of deformation, breakage (*e.g.*, glass jars), and leakage of containers
- Assure cooling water is of good sanitary quality. Chlorination or other suitable sanitizers shall be used to keep contamination to a minimum. A measurable free chlorine residual at the discharge end of the cooler is required for all cooling systems
- Maintain records showing chlorine residue checks and microbiological quality of the water

#### *l. Post Processing*

Suppliers shall develop and maintain a documented post processing operation program. The program shall include procedures for the cooling and drying of containers to protect against process contamination.