



Certificate of achievement

High Speed Training certifies that

FIRSTPLAY DIETARY FOODS LTD

has completed

Level 4 HACCP for Manufacturing

A certified and interactive online course designed to help managers and supervisors who work in food manufacturing understand what's involved in a HACCP food safety management system and how to successfully implement it in their business.

Issued On: 29/04/2022

Recommended Renewal Date: 28/04/2025

Certificate Number: T-2949635-3096703

To verify please visit: www.highspeedtraining.co.uk/verify







On behalf of High Speed Training





Amino Acid Analysis

Alta code

Analysis

A26167

Sample name

Chocolate Cereal

after hydrolysis, 24 hours at 110°C

Units /

mg

Per 259

AA	nmole / mg	ug / mg	mg / mg	g / 100g
Cysteic acid¹	-	- 1/1		_
Hydroxyproline ¹	THE WAR I	LINE MENT		
Aspartic acid	0.707	0.0814	0.0000814	0.00814
Threonine	0.546	0.0552	0.0000552	0.00552
Serine	1.02	0.0888	0.0000888	0.00888
Slutamic acid	3.32	0.429	0.000429	0.0429
Proline	1.20	0.116	0.000116	0.0116
Slycine	1.38	0.0788	0.0000788	0.00788
Alanine	1.81	0.129	0.000129	0.0129
Cystine	0.750	0.167	0.000167	0.0167
/aline	1.84	0.183	0.000183	0.0183
Methionine	0.608	0.0798	0.0000798	(8) 0.00798
soleucine	1.16	0.131	0.000131	0.0131
eucine	2.92	0.330	0.000330	(33) 0.0330
yrosine	0.451	0.0736	0.0000736	(1) 0.00736
Phenylalanine	1.19	0.176	0.000176	18) 0.0176
listidine	0.977	0.134	0.000134	0.0134
ryptophan¹				-
ysine	0.734	0.0941	0.0000941	0.00941
Arginine	0.756	0.118	0.000118	0.0118
Totals	21.4	2.46	0.00246	0.246

sample notes: Quantification of Aspartic Acid to Cystine may have been affected by sample-specific charring.

Notes about amino acid analysis:-

* on chromatogram denotes unknown, co-eluting or unsure assignment.

Asn and Gin are completely converted to Asp and Glu during the acid hydrolysis of the protein. The values for Thr and Ser have been corrected for hydrolysis losses of 5% and 10% respectively.

Trp usually suffers complete loss during acid hydrolysis and is not normally quantified.

Cys is usually observed as cystine and its recovery is variable using standard hydrolysis conditions.

The values for His are sometimes affected by co-eluting compounds from the sample.

The reported values have been rounded off to either 2 or 3 significant figures, depending on peak size.

Note 1. Although listed, values for these compounds are only assigned when specific analysis has been requested.

Reported by

Date 27/5/21



TEL:(44) 0161 480 4602 FAX:(44)0161 612 6161

E-M AIL: info@firstplaydf .com

WEB: www .prominpku.com

Ministry of Public Health Food and Safety Department

Document date - November 9th 2022

Reference - DEFRA Certificate Number 12021674

Dear Chairman

In the United Kingdom, health certificates are not issued for foods for special medical purposes as they contain products of no animal origin. Our department for food and rural affairs (DEFRA) issues Certificates of Free sale as outlined with our certificate number 12021674.

DEFRA's export certification provides the agency's official attestation concerning a product's regulatory or marketing status, based on available information at the time DEFRA issues the certificate (including, as appropriate, attestations provided by the person seeking the certificate).

The Certificate of Free sale is available only for dietary supplements, medical foods, and foods for special dietary use.

Certificates of Health are only issues on Collagen or Gelatin based products intended to be exported to the EU, which is not the product or ultimate destination on this order.

The document overleaf is signed by the secretary of state for environment, food and rural affairs whom are named DEFRA in the link: https://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs

Yours Sincerely

Mark Kerrigan Company Director



ADDRESS: Unit 13 Spark Business Park, Hamilton Road,

Stockport, Cheshire, SK1 2AE

TELEPHONE: 0161 480 4602 EMAIL: <u>info@firstplaydf.com</u> WEBSITE: <u>www.prominpku.com</u>

Product Data Sheet

Product Name

Promin Low Protein Cereal

Product Flavour

Chocolate

Product Weight

340g



Ingredients

Maize Starch, Tapioca Starch, Granulated Sugar, Water, Powdered Sugar, Coconut Fat, Arabic Gum, Cocoa Powder, Calcium Carbonate, Salt, Vanilla Flavour. For allergens, see ingredients in **bold**.

Amino Acid Profile

Amino Acid	G per 100g of product
Cysteic Acid	0.0000
Hydroxyproline	0.0000
Aspartic Acid	0.00814
Threonine	0.00552
Serine	0.00888
Glutamic Acid	0.0429
Proline	0.0116
Glycine	0.00788
Alanine	0.0129
Cystine	0.0167
Valine	0.0183
Methionine	0.00798
Isoleucine	0.0131
Leucine	0.0330
Tyrosine	0.00736
Phenylalanine	0.0176
Histidine	0.0134
Tryptophan	0.0000
Lysine	0.00941
Arginine	0.0118

	Mg per 100g of product	Per 34g serving*
Phenylalanine	18	6
Tyrosine	7	2
Methionine	8	3
Leucine	33	11

^{*}Nutritional information is based on one recommended serving of **34g** of product

Nutritional Information

	<u>Unit</u>	Per 100g of product	Per 34g serving
Energy	kJ	1837	625
	Kcal	436	148
Fat	g	12.3	4.2
of which saturates	g	10.23	3.5
Carbohydrates	g	81.0	27.5
of which sugars	g	18.4	6.2
Fibre	g	1.9	0.6
Protein	g	0.3	0.1
Salt	g	0.3	0.1

<u>Minerals</u>	<u>Unit</u>	Per 100g of product	Per 34g serving
Magnesium	mg	32	11
Phosphorus	mg	37	12.6
Calcium	mg	146	50
Potassium	mg	185	63
Chloride	mg	90	30.6
Sodium	g	0.1	0.03

Additional Information

- Store in a cool, dry, odour free place. To retain freshness fold down inner bag after use.
- Ready to eat
- Shelf Life 12 months
- Best before see top of pack
- Manufactured in the United Kingdom
- Important Notice: Food for special medical purposes, should be used under medical supervision. For use in the dietary management of inherited metabolic disorders, or conditions requiring a low protein diet. Not suitable as a sole source of nutrition. Not for parenteral use.



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Product Data Sheet

Product Name

Promin Low Protein All Purpose Baking Mix

Product Weight

2 x 500g (2 x 7g yeast sachets included)

Ingredients

Wheat Starch (Gluten), Yeast, Sugar, Stabiliser, Salt, Bicarbonate of Soda (Gluten), Guar Gum (E412), Fibre. For allergens, see ingredients in **bold**.

(2 x 7g yeast sachets contain: Dried Yeast, Emulsifier, Sorbitan Monosterate).

Amino Acid Profile

<u>Amino Acid</u>	G per 100g of dry product
Cysteic Acid	0.000
Hydroxyproline	0.000
Aspartic Acid	0.0098
Threonine	0.000
Serine	0.0043
Glutamic Acid	0.0125
Proline	0.0047
Glycine	0.006
Alanine	0.0043
Cystine	0.000
Valine	0.005
Methionine	0.0014
Isoleucine	0.0032
Leucine	0.0064
Tyrosine	0.0016
Phenylalanine	0.0038
Histidine	0.0068
Tryptophan	0.000
Lysine	0.0054
Arginine	0.0049

	Mg per 100g of dry product
Phenylalanine	4
Tyrosine	2
Methionine	1
Leucine	6

Nutritional Information

	<u>Unit</u>	Per 100g of dry product
Energy	kJ	1440
	Kcal	339
Fat	g	0.5
of which saturates	g	0.1
Carbohydrates	g	80.1
of which sugars	g	4.6
Fibre	g	6.2
Protein	g	0.1
Salt	g	0.3

Minerals	<u>Unit</u>	Per 100g of dry product
Sodium	g	0.1

Cooking Instructions

Can be used in various recipes. For bread made using a bread maker, to the bread making pan:

- Add 450ml water, 120ml vegetable oil, 5g salt and 500g of Promin All Purpose Baking Mix,
- Pour 7g of dried yeast on top of the baking mix do not mix together,
- Press start on the bread maker.

Additional Information

- Store in a cool dry place. Once opened store in an airtight container.
- Shelf Life 18 months from manufacture
- Manufactured in the United Kingdom
- Important Notice: Food for special medical purposes, should be used under medical supervision. For use in the dietary management of inherited metabolic disorders, or conditions requiring a low protein diet. Not suitable as a sole source of nutrition. Not for parenteral use.



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Product Data Sheet

Product Name

Promin Low Protein Pasta & Rice Spirals – Shells – Alphabets – Macaroni – Elbows – Flat Noodles – Short Cut Spaghetti – Imitation Rice – Cous Cous – Pastameal

Product Weight

500g

Ingredients

Maize Starch, Pregelatinized Maize Starch, Pregelatinized Potato Starch (modified), Emulsifier (E471), Stabiliser, Anti-oxidant (E300), Colour (E160a). For allergens, see ingredients in **bold**.

Amino Acid Profile

Amino Acid	G per 100g of dry product
Cysteic Acid	0.0000
Hydroxyproline	0.0000
Aspartic Acid	0.0119
Threonine	0.00441
Serine	0.00425
Glutamic Acid	0.0220
Proline	0.00956
Glycine	0.00566
Alanine	0.00926
Cystine	0.0000
Valine	0.00848
Methionine	0.0040
Isoleucine	0.00549
Leucine	0.0140
Tyrosine	0.0024
Phenylalanine	0.0080
Histidine	0.00643
Tryptophan	0.0000
Lysine	0.00624
Arginine	0.00620

	Mg per 100g of dry product
Phenylalanine	9
Tyrosine	2
Methionine	4
Leucine	19

Nutritional Information

	<u>Unit</u>	Per 100g of dry product
Energy	kJ	1500
	Kcal	353
Fat	g	0.8
of which saturates	g	0.64
Carbohydrates	g	86.2
of which sugars	g	<0.1
Fibre	g	0.5
Protein	g	0.153
Salt	g	0.15

<u>Minerals</u>	<u>Unit</u>	Per 100g of dry product
Sodium	g	0.06

Cooking Instructions

- To 1l of boiling water, add 75g of pasta,
- Simmer approximately 8 minutes or to taste, drain and rinse.

Additional Information

- Store in a cool dry place
- Shelf Life 24 months from manufacture
- Manufactured in the United Kingdom
- Important Notice: Food for special medical purposes, should be used under medical supervision. For use in the dietary management of inherited metabolic disorders, or conditions requiring a low protein diet. Not suitable as a sole source of nutrition. Not for parenteral use.



TEST CERTIFICATE

Medcalfe Way Bridge Street Chatteris Cambridgeshire PE16 6QZ England Telephone: 01354 695858

Page 1 of 5

Mr Mark Kerrigan Firstplay Dietary Foods Ltd Unit 4 Avondale Industrial Estate Avondale Road Edgeley Stockport, Cheshire

SK1 4BP

Fax: 0161 612 6161

Certificate Number: TCHC1215623-1 Final

Date Reported: 04/05/2021

Date Analysis Started: 12/04/2021

Order Number: MSK1421

Lab Ref.	Sample Details	Method Number	Test	Result	Units	Flag
CHC1549563	Desc: L/P Cereal Chocolate (Amino).	AM/V/206	Aspartic Acid (Total)	0.12	g / 100g	Ì
	Order No: MSK1421 Date Received: 12/04/2021	AM/V/206	Serine (Total)	0.06	g / 100g	
	Date Tested: 12/04/2021	AM/V/206	Glutamic Acid (Total)	0.19	g / 100g	
		AM/V/206	Glycine (Total)	0.05	g / 100g	
		AM/V/206	Histidine (Total)	0.02	g / 100g	
		AM/V/206	Arginine (Total)	0.08	g / 100g	
		AM/V/206	Threonine (Total)	0.05	g / 100g	
		AM/V/206	Alanine (Total)	0.06	g / 100g	
		AM/V/206	Proline (Total)	0.07	g / 100g	
		AM/V/206	Cystine (Total)	<0.02	g / 100g	
		AM/V/206	Tyrosine (Total)	0.04	g / 100g	
		AM/V/206	Valine (Total)	0.05	g / 100g	
		AM/V/206	Methionine (Total)	<0.02	g / 100g	
		AM/V/206	Lysine (Total)	0.04	g / 100g	
		AM/V/206	Iso-Leucine (Total)	0.04	g / 100g	
		AM/V/206	Leucine (Total)	0.08	g / 100g	
		AM/V/206	Phenylalanine (Total)	0.07	g / 100g	
CHC1549564	Desc: L/P Cereal Banana (Amino).	AM/V/206	Aspartic Acid (Total)	0.04	g / 100g	
	Order No: MSK1421 Date Received: 12/04/2021	AM/V/206	Serine (Total)	<0.02	g / 100g	
	Date Tested: 12/04/2021	AM/V/206	Glutamic Acid (Total)	0.06	g / 100g	
		AM/V/206	Glycine (Total)	<0.02	g / 100g	
		AM/V/206	Histidine (Total)	<0.02	g / 100g	
		AM/V/206	Arginine (Total)	0.02	g / 100g	
		AM/V/206	Threonine (Total)	<0.02	g / 100g	
		AM/V/206	Alanine (Total)	<0.02	g / 100g	
		AM/V/206	Proline (Total)	0.03	g / 100g	
		AM/V/206	Cystine (Total)	<0.02	g / 100g	
		AM/V/206	Tyrosine (Total)	<0.02	g / 100g	
		AM/V/206	Valine (Total)	<0.02	g / 100g	
		AM/V/206	Methionine (Total)	<0.02	g / 100g	
		AM/V/206	Lysine (Total)	<0.02	g / 100g	
		AM/V/206	Iso-Leucine (Total)	<0.02	g / 100g	
		AM/V/206	Leucine (Total)	0.02	g / 100g	
		AM/V/206	Phenylalanine (Total)	0.04	g / 100g	



Certificate Number: TCHC1215623-1 Final Page 2 of 5

Lab Ref.	Sample Details	Method Number	Test	Result	Units	Flag
CHC1549565	Desc: L/P Cereal Chocolate (G2).	AM/C/1015	Moisture (Loss on Drying)	4.3	g / 100g	
	Order No: MSK1421 Date Received: 12/04/2021	AM/C/224	Protein (Nx6.25)	1.33	g / 100g	
	Date Tested: 16/04/2021	AM/C/1015	Total Fat (NMR)	12.3	g / 100g	
		AM/C/803	Ash	1.1	g / 100g	
		AM/C/901	Total Carbohydrate (by difference)	81.0	g / 100g	
		AM/C/309	Total Dietary Fibre (AOAC)	1.9	g / 100g	
		AM/C/901	Available Carbohydrate (by difference)	79.1	g / 100g	
		AM/C/901	Energy	436	kcal / 100g	
		AM/C/901	Energy	1837	kJ / 100g	
		AM/C/1014	Total Sugar	18.2	g / 100g	
		AM/C/1002	Calcium	146	mg / 100g	
		AM/C/1002	Potassium	185	mg / 100g	
		AM/C/1002	Magnesium	32.0	mg / 100g	
		AM/C/1002	Phosphorus	36.8	mg / 100g	
		AM/C/1002	Sodium (ICP-OES)	94.9	mg / 100g	
		AM/C/603	Chloride	0.09	g / 100g	
		AM/C/107	Saturated Fatty Acids (in sample)	10.23	g / 100g	
		AM/C/107	Monounsaturated Fatty Acids (in sample)	1.21	g / 100g	
		AM/C/107	Polyunsaturated Fatty Acids (in sample)	0.32	g / 100g	
CHC1549566	Desc: L/P Cereal Banana (G2).	AM/C/1015	Moisture (Loss on Drying)	6.8	g / 100g	
	Order No: MSK1421	AM/C/224	Protein (Nx6.25)	0.38	g / 100g	
	Date Received: 12/04/2021 Date Tested: 16/04/2021	AM/C/1015	Total Fat (NMR)	12.0	g / 100g	
		AM/C/803	Ash	0.6	g / 100g	
		AM/C/901	Total Carbohydrate (by difference)	80.2	g / 100g	
		AM/C/309	Total Dietary Fibre (AOAC)	1.4	g / 100g	
		AM/C/901	Available Carbohydrate (by difference)	78.8	g / 100g g / 100g	
		AM/C/901	Energy	428	kcal / 100g	
		AM/C/901	Energy	1802	kJ / 100g	
		AM/C/1014	Total Sugar	17.7	g / 100g	
		AM/C/1002	Calcium	140	mg / 100g	
		AM/C/1002 AM/C/1002	Potassium		* *	
		AM/C/1002 AM/C/1002	Magnesium	13.7 5.98	mg / 100g	
					mg / 100g	
		AM/C/1002	Phosphorus	9.46	mg / 100g	
		AM/C/602	Sodium (ICP-OES)	118	mg / 100g	
		AM/C/603	Chloride	0.08	g / 100g	
		AM/C/107	Saturated Fatty Acids (in sample)	10.28	g / 100g	
		AM/C/107	Monounsaturated Fatty Acids (in sample)	0.92	g / 100g	
		AM/C/107	Polyunsaturated Fatty Acids (in sample)	0.27	g / 100g	
CHC1549567	Desc: L/P Cereal Chocolate (Sucralose ETC).	AM/C/1015	Total Fat (NMR)	12.0	g / 100g	
	Order No: MSK1421	AM/C/1014	Fructose	0.08	g / 100g	
	Date Received: 12/04/2021 Date Tested: 16/04/2021	AM/C/1014	Galactose	<0.01	g / 100g	
		AM/C/1014	Glucose	0.08	g / 100g	
		AM/C/1014	Lactose	0.02	g / 100g	
		AM/C/1014	Maltose	<0.03	g / 100g	
		AM/C/1014	Sucrose	18.21	g / 100g	
		AM/C/1014	Total Sugar	18.4	g / 100g	
		AM/C/1002	Calcium	146	mg / 100g	



Certificate Number: TCHC1215623-1 Final Page 3 of 5

Lab Ref.	Sample Details	Method Number	Test	Result	Units	Flag
CHC1549567	Continued from Page 2	AM/C/1002	Potassium	178	mg / 100g	
İ		AM/C/1002	Magnesium	30.8	mg / 100g	
		AM/C/1002	Phosphorus	35.8	mg / 100g	
		AM/C/603	Chloride	0.10	g / 100g	
		AM/C/107	FAME C6.0 Caproic Acid (In Fat)	0.27	g / 100g	
		AM/C/107	FAME C8.0 Caprylic Acid (In Fat)	4.45	g / 100g	
		AM/C/107	FAME C10.0 Capric Acid (In Fat)	4.28	g / 100g	
		AM/C/107	FAME C12.0 Lauric Acid (In Fat)	39.23	g / 100g	
		AM/C/107	FAME C14.0 Myristic Acid (In Fat)	17.32	g / 100g	
		AM/C/107	FAME C14.1 Myristoleic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C15.0 Pentadecanoic Acid (In Fat)	0.03	g / 100g	
		AM/C/107	FAME C16.0 Palmitic Acid (In Fat)	11.70	g / 100g	
		AM/C/107	FAME C16.1 Palmitoleic Acid (In Fat)	0.04	g / 100g	
		AM/C/107	FAME C17.0 Heptadecanoic Acid (In Fat)	0.03	g / 100g	
		AM/C/107	FAME C17.1 Heptadecenoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C18.0 Stearic Acid (In Fat)	5.71	g / 100g	
		AM/C/107	FAME C18.1 Oleic Acid (In Fat)	9.72	g / 100g	
		AM/C/107	FAME C18.2 Linoleic Acid (In Fat)	2.35	g / 100g	
		AM/C/107 AM/C/107	FAME C18.3 Linolenic Acid (omega 3) (In Fat) FAME C18.3 Linolenic Acid (omega 6) (In	0.08 <0.01	g / 100g g / 100g	
		AM/C/107	Fat) FAME C18.4 Octadecatetraenoic Acid (In	<0.01	g / 100g	
		AM/C/107	Fat) FAME C20.0 Arachidic Acid (In Fat)	0.19	g / 100g	
		AM/C/107	FAME C20.1 Gadoleic Acid (In Fat)	0.06	g / 100g	
		AM/C/107	FAME C20.2 Eicosadienoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.3 Eicosatrienoic Acid (omega 3) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.3 Eicosatrienoic Acid (omega 6) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.4 Eicosatetraenoic Acid (omega 3) (In Fat)	<0.01	g / 100g	
		AM/C/107 AM/C/107	FAME C20.4 Arachidonic Acid (omega 6) (In Fat) FAME C20.5 Eicosapentaenoic Acid (In Fat)	<0.01 <0.01	g / 100g g / 100g	
		AM/C/107	FAME C22.0 Behenic Acid (In Fat)	0.04	g / 100g	
		AM/C/107	FAME C22.1 Erucic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.4 Docosatetraenoic Acid (In Fat)	0.04	g / 100g	
		AM/C/107	FAME C22.5 Clupanodonic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.6 Docosahexaenoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C24.0 Lignoceric Acid (In Fat)	0.06	g / 100g	
		AM/C/107	Saturated Fatty Acids (in sample)	10.00	g / 100g	
		AM/C/107	Monounsaturated Fatty Acids (in sample)	1.18	g / 100g	
		AM/C/107	Polyunsaturated Fatty Acids (in sample)	0.30	g / 100g	
		AM/C/107	Estimated Total Omega 3 (in fat)	0.08	g / 100g	
		AM/C/107	Estimated Total Omega 3 (in sample)	10	mg / 100g	
		AM/C/107	FAME C15.1 Pentadecenoic Acid (In Fat)	<0.01	g / 100g	
		CALC	Estimated Total Omega 3 (in fat)	0.08	g / 100g	
		CALC	Estimated Total Omega 3 (in sample)	10	mg / 100g	
		CALC	Estimated Total Omega 6 iln fat)	2.39	g / 100g	



Certificate Number: TCHC1215623-1 Final Page 4 of 5

Lab Ref.	Sample Details	Method Number	Test	Result	Units	Flag
CHC1549567	Continued from Page 3	CALC	Estimated Total Omega 6 (in sample)	287	mg / 100g	
CHC1549568	Desc: L/P Cereal Banana (Sucralose	c: L/P Cereal Banana (Sucralose AM/C/1015 Total Fat (NMR) 11.4		11.4	g / 100g	
	ETC). Order No: MSK1421	AM/C/1014	Fructose	0.05	g / 100g	
	Date Received: 12/04/2021	AM/C/1014	Galactose	<0.01	g / 100g	
	Date Tested: 16/04/2021	AM/C/1014	Glucose	0.09	g / 100g	
		AM/C/1014	Lactose	<0.01	g / 100g	
		AM/C/1014	Maltose	0.15	g / 100g	
		AM/C/1014	Sucrose	18.83	g / 100g	
		AM/C/1014	Total Sugar	19.1	g / 100g	
		AM/C/1002	Calcium	143	mg / 100g	
		AM/C/1002	Potassium	13.9	mg / 100g	
		AM/C/1002	Magnesium	6.12	mg / 100g	
		AM/C/1002	Phosphorus	9.85	mg / 100g	
		AM/C/603	Chloride	0.13	g / 100g	
		AM/C/107	FAME C6.0 Caproic Acid (In Fat)	0.33	g / 100g	
		AM/C/107	FAME C8.0 Caprylic Acid (In Fat)	5.02	g / 100g	
		AM/C/107	FAME C10.0 Capric Acid (In Fat)	4.76	g / 100g	
		AM/C/107	FAME C12.0 Lauric Acid (In Fat)	42.98	g / 100g	
		AM/C/107	FAME C14.0 Myristic Acid (In Fat)	18.74	g / 100g	
		AM/C/107	FAME C14.1 Myristoleic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C15.0 Pentadecanoic Acid (In Fat)	0.01	g / 100g	
		AM/C/107	FAME C16.0 Palmitic Acid (In Fat)	10.39	g / 100g g / 100g	
		AM/C/107	FAME C16.1 Palmitoleic Acid (In Fat)	0.02	g / 100g g / 100g	
		AM/C/107	FAME C17.0 Heptadecanoic Acid (In Fat)	0.02	g / 100g g / 100g	
		AM/C/107	· · · · · · · · · · · · · · · · · · ·	<0.01		
		AM/C/107	FAME C17.1 Heptadecenoic Acid (In Fat)	3.21	g / 100g	
			FAME C18.1 Oleia Asid (In Fat)		g / 100g	
		AM/C/107	FAME C18.1 Oleic Acid (In Fat)	7.82	g / 100g	
		AM/C/107	FAME C18.2 Linoleic Acid (In Fat)	2.01	g / 100g	
		AM/C/107	FAME C18.3 Linolenic Acid (omega 3) (In Fat)	0.05	g / 100g	
		AM/C/107 AM/C/107	FAME C18.3 Linolenic Acid (omega 6) (In Fat) FAME C18.4 Octadecatetraenoic Acid (In	<0.01 <0.01	g / 100g	
		Alvi/C/107	Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.0 Arachidic Acid (In Fat)	0.11	g / 100g	
		AM/C/107	FAME C20.1 Gadoleic Acid (In Fat)	0.06	g / 100g	
		AM/C/107	FAME C20.2 Eicosadienoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.3 Eicosatrienoic Acid (omega 3) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.3 Eicosatrienoic Acid (omega 6) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.4 Eicosatetraenoic Acid (omega 3) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.4 Arachidonic Acid (omega 6) (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C20.5 Eicosapentaenoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.0 Behenic Acid (In Fat)	0.03	g / 100g	
		AM/C/107	FAME C22.1 Erucic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.4 Docosatetraenoic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.5 Clupanodonic Acid (In Fat)	<0.01	g / 100g	
		AM/C/107	FAME C22.6 Docosahexaenoic Acid (In Fat)	<0.01	g / 100g	



Certificate Number: TCHC1215623-1 Final Page 5 of 5

Lab Ref.	Sample Details	Method Number	Test	Result	Units	Flag
CHC1549568	Continued from Page 4	AM/C/107	FAME C24.0 Lignoceric Acid (In Fat)	0.05	g / 100g	
		AM/C/107	Saturated Fatty Acids (in sample)	9.76	g / 100g	
		AM/C/107	Monounsaturated Fatty Acids (in sample)	0.90	g / 100g	
		AM/C/107	Polyunsaturated Fatty Acids (in sample)	0.23	g / 100g	
		AM/C/107	Estimated Total Omega 3 (in fat)	0.05	g / 100g	
		AM/C/107	Estimated Total Omega 3 (in sample)	6	mg / 100g	
		AM/C/107	FAME C15.1 Pentadecenoic Acid (In Fat)	<0.01	g / 100g	
		CALC	Estimated Total Omega 3 (in fat)	0.05	g / 100g	
		CALC	Estimated Total Omega 3 (in sample)	6	mg / 100g	
		CALC	Estimated Total Omega 6 iln fat)	2.01	g / 100g	
		CALC	Estimated Total Omega 6 (in sample)	229	mg / 100g	

The results for saturated, monounsaturated and polyunsaturated fatty acids in the sample use a 0.956 conversion factor for non fatty acid material in the fat.

The values above for the total monounsaturated fatty acids and total polyunsaturated fatty acids are inclusive of both cis and trans components.

The above Arginine result should be considered as approximation if the amino acid Taurine is present within this sample. Taurine can be analysed by ALS using a separate method.

Amino acids results are reported on an as calculated basis without any correction factors applied for differences in hydrolysis rates based on individual amino acids.

Certificate approved and electronically signed on 04/05/21 11:00 By Gemma A. Parr, Section Head Vitamins and Additives

Certificate approved and electronically signed on 30/04/21 17:35 By Kristina Balciuniene, Chemistry Service Coordinator

For and on Behalf of ALS Laboratories (UK) Limited









TEL:(44) 0161 480 4602 FAX:(44)0161 612 6161

E-M AIL: info@firstplaydf .com

WEB: www .prominpku.com

Letter of Conformity

Date: 16th September 2025

To Whom It May Concern,

We hereby confirm that the following products manufactured by Firstplay Dietary Foods Ltd. are classified as Foods for Special Medical Purposes (FSMPs) in accordance with applicable regulations governing medical nutrition:

- Promin Low Protein Flour / All Purpose Baking Mix 1000g
- Promin Low Protein Short Cut Spaghetti 500g
- Promin Low Protein Flat Noodles 500g
- Promin Low Protein Fusilli / Spirals 500g
- Promin Low Protein Macaroni 500g
- Promin Low Protein Cereal Balls 340g

These products are specifically formulated for the dietary management of individuals with inherited metabolic disorders requiring a low protein diet, such as Phenylketonuria (PKU) and other amino acid metabolism disorders.

They are not intended for general consumption and should be used under medical supervision. All products comply with relevant food safety and labelling standards and are manufactured in facilities adhering to Good Manufacturing Practices (GMP).

Please find enclosed: - Product datasheets detailing ingredients and nutritional profiles - Manufacturer-issued documentation confirming FSMP status - Copies of relevant certifications and regulatory compliance documents

Should you require any further information or clarification, please do not hesitate to contact us. Sincerely,

Mark Kerrigan Firstplay Dietary Foods Ltd.







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w: www.altabioscience.bham.ac.uk

Printed 03/09/2010 A19736 S Fletcher.xls

Amino Acid Analysis

Alta code

A19736

Sample name

Promin Pasta

Units / mg

Analysis

after hydrolysis, 24 hours at 110°C

AA	n.mole / mg	u.g / mg	m.g / mg	g / 100g
Cysteic acid	- i- 	-	-	-
Hydroxyproline	-	15m = 72h	- 8	
Aspartic acid	1.20	0.138	0.000138	0.0138
Threonine	0.540	0.0546	0.0000546	0.00546
Serine	0.787	0.0685	0.0000685	0.00685
Glutamic acid	2.04	0.264	0.000264	0.0264
Proline	1.09	0.105	0.000105	0.0105
Glycine	1.10	0.0627	0.0000627	0.00627
Alanine	1.54	0.110	0.000110	0.0110
Cystine		-	-	-
Valine	0.972	0.0963	0.0000963	0.00963
Methionine	0.303	0.0398	0.0000398	0.00398
Isoleucine	0.564	0.0638	0.0000638	0.00638
Leucine	1.65	0.187	0.000187	0.0187
Tyrosine	0.234	0.0382	0.0000382	0.00382
Phenylalanine	0.578	0.0851	0.0000851	0.00851
Histidine	0.639	0.0877	0.0000877	0.00877
Tryptophan	-			-
Lysine	0.512	0.0656	0.0000656	0.00656
Arginine	0.383	0.0598	0.0000598	0.00598
Totals	14.1	1.53	0.00153	0.153

sample notes:

Notes about amino acid analysis:- Asn and Gln are completely converted to Asp and Glu during the acid hydrolys of the protein. The values for Thr and Ser have been corrected for hydrolysis losses of 5% and 10% respectively. Trp usually suffers complete loss during acid hydrolysis and is not normally quantified. In proteins, Cys is usually observed as cystine. The recovery of Cys is variable when using standard hydrolysis conditions. The reported values have been rounded off to either 2 or 3 significant figures, depending on peak size.

For more details on the reports and the data please see

http://www.altabioscience.bham.ac.uk/services/amacid/reporting.shtml

Reported by

E. A. Chturejale

Date 3/9/10



Title: Quality Policy

DOC No:	QMS1.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

FOOD SAFETY & QUALITY POLICY STATEMENT

The Senior Management of **Firstplay** are committed to provide all necessary resources and training to ensure that all operations, including intake, packing, storage and distribution are carried out to the standards laid out in the FSSC22000 and ISO22000 standard and to meet all requirements including regulatory, customer, safety and social requirements.

Safety, Legality, Authenticity and Quality of our products shall be our first priority.

The continuing objective is to supply the customer with a product that both **Firstplay** and our customers can be proud of in terms of:

Safety, Legality, Authenticity, Quality and Presentation

Firstplay are committed to continuously improve the food safety culture.

Firstplay are committed to offer a product that is attractive to the customer; and which serves the commercial interest of both **Firstplay** and our customers. Accordingly, it is also in the interests of **Firstplay** Site Staff that we strive for excellence in the handling of the product remembering that today's customers are ever more demanding.

It is for the above reason that customer's specifications and Site HACCP System and Food Safety and Quality Manual Procedures must at all times be strictly adhered to during all stages of handling and storage.

It is the responsibility of Management to ensure that all key personnel are fully conversant with each customer's requirements. The maintenance of excellent records is essential for all handling and storage stages. Such records are indispensable under current Due Diligence Legislation.

All staff play a key role in ensuring only acceptable goods are despatched. It is important therefore that all control systems are adhered to strictly in the interests of ensuring that only safe products of excellent quality leave **Firstplay** premises.

In order to achieve this, the Documented Food Safety and Quality System ensures that the Site can fulfil contractual obligations by:

- Ensuring that all activities which directly affect the safety, legality, authenticity and quality of service are carried out under controlled conditions.
- Continuous monitoring and analysis of safety and quality indicators which provide the feedback to enable safety and quality improvement against Customer needs and expectations.
- Ensuring all operatives are provided with basic food hygiene instruction together with specific job training.
- Ensuring in addition that Key Managers and Operatives have a higher level of training appropriate to their job role, including HACCP and Food Safety.

We are committed to provide resources to maintain and improve the Food Safety and Quality Management System in order to enhance customer satisfaction and continually improve its effectiveness.

The Management will ensure that this policy is communicated, understood and implemented at all levels within the organisation. All staff will be required to comply with the Food Safety and Quality Manual.

Name	Signed	Date	Position
Tom Fletcher			Managing Director



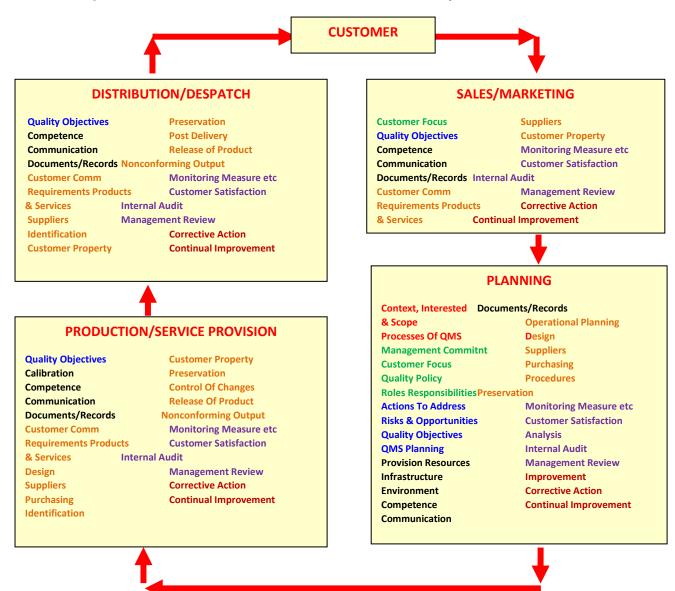
DOC No:	Section 4
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 4.1 - Understanding the Organisation and its context

Firstplay Dietary Foods have determined external and internal issues that are relevant to its purpose and that can affect its ability to achieve the intended results of FSMS. Firstplay Dietary Foods has a mechanism to identify review, and update external and internal issues.

Context of the Organisation

KEY:- RED = Context of the Organisation GREEN = Leadership BLUE = Planning BLACK = Support ORANGE = Operation PURPLE = Performance Evaluation BROWN = Improvement





DOC No:	Section 4
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 4.2- Understanding the needs and expectations of interested parties

Because of their effect or potential effect on the company's ability to consistently provide products that satisfy customer and applicable legal / regulatory requirements, Firstplay Dietry Foods has identified the interested parties that are relevant to the Integrated Management System and has determined their requirements (which are relevant to the Food Safety Management System).

Firstplay Dietry Foods monitors and reviews information about these interested parties and their requirements.

CONTEXT, INTERESTED PARTIES & SCOPE

PROCEDURE OWNER: Managing Director

CONTEXT: The company has identified external and internal issues which are relevant to its purpose and strategic direction and which can affect its ability to achieve the intended results of the Integrated Management System.

The issues which follow form the basis of "Actions To Address Risks And Opportunities" which is part of the formal **Management Review** agenda. These issues are mainly: EXTERNAL:

Opportunities / Positive Issues: Research and Development (i.e. new products)

Market Research (new markets / outlets for new

products)

Matching product to potential market

Private health facilities

Public

Risks / Negative Issues: Competition

Product / Market Failure

What Information is Monitored /Reviewed / How: Competitors products

Competitors prices

Competitors packaging / advertising, etc.

INTERNAL:

Opportunities / Positive Issues: Process / Production Improvements

Packaging

Additional Resources

Risks / Negative Issues: Human Error
What Information is Monitored / Reviewed / How: Customer Feedback

Certification Body Assessment / Audit Notes

Competitors Products / Services



DOC No:	Section 4
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

In addition to the Legal Register, Firstplay Dietry Foods have identified the following Interested Parties:

STAKEHOLDER	REQUIREMENTS	EXPECTATIONS OF IMPACT OF CLIMATE CHANGE	ACTIONS TO BE TAKEN	NAME OF RESPONSIBLE PERSON	MONITORING AUTHORITY
Primary Investors -	Return on Investment	None	Business development and growth	Managing Director	Managing Director
Supplier and Service Providers	Reliability	None	Materials and Service delivery	Managing Director	Managing Director
Employees	Reliable Employment and security	None	Continuous Training, Support and development opportunities	Managing Director / Production Manager	Managing Director
Contractors	Longjevity of partnership	None	Deliver effective and efficient service	Managing Director	Managing Director
Customers / Clients / NHS / Consumers	Quality of Service ISO / FSSC acreditation	None	Deliver effective and efficient service	Managing Director	Managing Director
Board of Directors	Return on Investment	None	Business Growth and development	Managing Director	Managing Director

Firstplay Dietary Foods have considered the impact and expectations of all interested parties with regards to Climate Change. At present there are no specific expectations.



DOC No:	Section 4
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 4.3- Determining the scope of the Food Safety Management System

Firstplay Dietary Foods have determined the boundaries and applicability of its Food Safety Management System in establishing its scope.

In determining its scope, Firstplay Dietary Foods have considered the external and internal issues referred to in 4.1 (Understanding The Organisation And Its Context), the interested party requirements referred to in 4.2 (Understanding The Needs And Expectations Of Interested Parties), and the company's products, services, processes and production site have shall included the activities, processes product or service that can have an influence on the food safety of the end products.

The scope of the Food Safety Management System is as follows:

The development, manufacture, packing, and distribution of low protein food products including dried pastas, pasta in sauce meals, meat substitutes, instant meals and bread products.

ISO22000:2018 reference: 4.4- Food Safety Management System

Firstplay Dietary Foods are committed to establish, implement, maintain, updated, and continually improve the food safety management system including the processes needed and their interactions, in accordance with the requirements of ISO22000:2018, FSSC v6, and ISO-TS-22002-1-PRP-Food-safety-Food-manufacturing



Title: Section 5 – Leadership

DOC No:	Section 5
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 5.1 – Leadership and Commitment

Top management at Firstplay Dietary Foods demonstrates leadership and commitment with respect the food safety management system by ensuring that the integration of food safety management system requirements into the organization's business process and the resource needed for the food safety management system by:

- 1. Taking accountability for the effectiveness of the Food Safety Management System
- 2. Making sure that the food safety policy and the objectives of the Food Safety Management System are established and are compatible with the strategic direction of the organization
- 3. Making sure that the Food Safety Management System requirements are integrated into the company's business processes
- 4. ensuring that the resources needed for the Food Safety Management System are available
- 5. Making sure that the resources needed for the QMS are available
- 6. Communicating the importance of effective Food Safety Management System and of complying with Food Safety Management System requirements, applicable statutory and regulatory requirements, and mutually agreed customer requirements related to food safety
- 7. Making sure that the Food Safety Management System evaluated and maintained to achieve its intended results
- 8. Engaging, directing and supporting people to contribute to the effectiveness of the Food Safety Management System.
- 9. Promoting continual improvement
- 10. Supporting other relevant management roles to show their leadership as it applies to their areas of responsibility.

Food Safety Manual references: Management Review Food Safety Policy

ISO22000:2018 reference: 5.2 - Policy

5.2.1 - Establishing the Food Safety Policy

Firstplay Dietary Foods have established, implemented, and maintained a food safety policy that Is appropriate to the purpose and context of organization and provides a framework for setting and reviewing the objectives of food safety management system.

Firstplay Dietary Foods are dedicated to supplying customers with low protein dietary products that are safe, legal and authentic. Firstplay Dietary Foods are aware of its obligation to act in the best interest of its customers at all times. The policy is signed by the MD. First Play Dietary Foods are committed to continuously improve the food safety culture.

All key personnel understand the Food Safety Policy and have implemented it accordingly.

5.2.2 - Communicating the food safety policy

The Site's dedication to its Food Safety Management System has been communicated to all staff and the Food Safety Policy Statement that is regularly reviewed, is posted on the reception wall, staff rest area, and is available to all external sources on request.

In addition, all staff receive a copy of the policy and sign to indicate receipt and understanding of this at induction.



Title: Section 5 – Leadership

DOC No:	Section 5
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

5.3 - Organizational roles, responsibilities and authorities

5.3.2 - Top management at Firstplay Dietary Foods have assigned the responsibilities and authorities for relevant roles, communicated these, and ensure they are understood within the organization. Top management have assigned the responsibility and authority for:

- a) ensuring that the FSMS conforms to the requirements of this document;
- b) reporting on the performance of the FSMS to top management;
- c) appointing the food safety team and the food safety team leader;
- d) designating persons with defined responsibility and authority to initiate and document action(s)

The **Organisational Structure** shows responsibilities and reporting relationships of all staff. whose activities affect product safety, legality, authenticity and quality

5.3.2 - The food safety team leader shall be responsible for:

- a) ensuring the FSMS is established, implemented, maintained and updated;
- b) managing and organizing the work of the food safety team;
- c) ensuring relevant training and competencies for the food safety team (see 7.2);
- d) reporting to top management on the effectiveness and suitability of the FSMS.

The Site's Managing Director ensures that all staff are aware of their responsibilities and demonstrate that work is carried out in accordance with documented site policies, procedures, work instructions and existing practices for activities undertaken. All staff shall have access to relevant documentation.

Management also ensure that mechanisms are in place to monitor the effectiveness of their operation.

Covering Absence of Key Staff.

Suitably trained and experienced staff are available to cover for the absence of key personnel as detailed on the next page. Staff are multi-skilled which ensures the appropriate standards and adherence to the Quality System is maintained at all times.

POSITION	NOMINATED STAND-IN / TEAM	
Managing Director (TL)	Factory Manager / Technical Consultant	
Factory Manager	Managing Director / Supervisors	
Supervisor	Factory Manager / Supervisors	
Technical Consultant	Provides own resources	

Signed Job descriptions are available for all key personnel, all staff are aware of their reporting structure and of their key role in the organisation. Two signed copies of the job descriptions exist, one copy is kept in the Employee's personal training file and the other is held by the Employee.

All work activities within the organisation have documented work instructions and all relevant personnel have access to these for reference if required and are able to demonstrate that work is carried out in accordance with the instruction.



Title: Section 5 – Leadership

DOC No:	Section 5
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

5.3.3 - All persons shall have the responsibility to report problem(s) with regards to the FSMS to identified person(s).

The site is committing to ensure all employees are aware of the need to report and evidence of unsafe or out of specification product or raw materials to their line manager. All reports will be discussed with the senior management team.



Title: Section 6 – Planning	DOC No:	Section 6
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

ISO22000:2018 reference: 6.1 – Actions to Address Risks and Opportunities

6.1.1 - When planning for the Food Safety Management System, Firstplay Dietary Foods have considered the issues referred to in 4.1 and the requirements referred to in 4.2 and 4.3 and determine the risks and opportunities that need to be addressed to:

Provide assurance that the Food Safety Management System can achieve its intended result(s); Enhance desirable effects;

Prevent, or reduce, undesired effects;

Achieve continual improvement.

6.1.1 - Firstplay Dietary Foods has:

Planned actions to address these risks and opportunities

Planned how to integrate and implement these actions into the IMS processes (4.4 Integrated Management System And Its Processes) and planned how to evaluate the effectiveness of the actions. Actions taken to address risks and opportunities are proportionate to the potential impact on product and service conformity.

Determining relevant Risks and Opportunities is an activity that can take place at any time, according to circumstances. Formally this will take place at the Management Review using a specific methodology.

Once identified, actions taken to address Risks and Opportunities may be in the form of Quality Objectives and can be formally monitored / reviewed through the Internal Audit and Management Review functions, although informally this can take place at any time, as appropriate to circumstances.

METHODOLOGY:

Determining Risks: a simple Likelihood factor (1{unlikely to occur} to 5 {certain to occur}) multiplied by a Severity factor (1{no effect} to 5 {catastrophe}) to give a Risk Level and help prioritise any actions. **Determining Opportunities**: a Possibility or Practicality factor (1 {not possible / practical} to 5 {Easy to implement/introduce}) multiplied by Potential Benefit (1{no real benefit} to 5{highly beneficial}) to provide an overall Opportunity factor.

Those Risks and Opportunities deemed relevant which require addressing can then be actioned (either as stand-alone actions or Quality Objectives) and monitored through Internal Audits or other channels.

Actions taken to address risks and opportunities are proportionate to the effect or impact on product or service conformity.

Risk and Opportunity Methodology Assessments and documents are retained as a record, either as minutes from Management Reviews or other meetings, along with reviews and any further actions, including evaluations of effectiveness.. Quality Objectives are retained as a record.

Quality Manual references:

Management Review Quality Risk Assessment



DOC No:	Section 6
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

HACCP Plan

ISO22000:2018 reference: 6.1- Objectives of the food safety management system and planning to achieve them

6.2.1 – Firstplay Dietary Foods have established objectives for the Food Safety Management System at relevant functions and levels and processes needed for the Food Safety Management System.

The objectives of the Food Safety Management System are:

Consistent with the food safety policy;

Measurable (if practicable);

Take into account applicable food safety requirements, including statutory, regulatory and customer requirements;

Monitored and verified;

Communicated;

Maintained and updated as appropriate.

Firstplat Dietary Foods maintains documented information on the objectives for the Food Safety Management System.

- **6.2.2** In planning how to achieve its objectives for the Food Safety Management System, Firstplay Dietary Foods has determined:
- 1. What will be done
- 2. What resources will be needed
- 3. Who is responsible
- 4. The timescale for completion
- 5. How the results will be evaluated.

Quality Manual references:

Management Review

- **6.2.3** When Firstplay Dietary Foods identifies the need for changes to its Food Safety Management System, the changes are carried out in a planned manner. When this happens, Firstplay Dietary Foods considers:
- 1. The purpose of the changes and the possible consequences
- 2. The integrity of the Food Safety Management System
- 3. The availability of resources
- 4. The allocation or reallocation of responsibilities and authorities.



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

ISO22000:2018 reference: 7.1 – Resources

7.1.1 – Firstplay Dietary Foods has determined and provides for the resources needs to establish and maintain the Food Safety Management System.

In doing this, Firstplay Dietary Foods has considered:

- a) the capability of, and any constraints on, existing internal resources;
- b) the need for external resources.

The company has determined what resources both internal and external (and what people) are necessary to implement, operate, maintain and continually improve the effectiveness of the Quality Management System and has provided such resources as are necessary to achieve those aims. The importance of achieving customer satisfaction by fulfilling customer requirements is paramount to the success of the business and this is widely understood within the company.

Further or additional resource requirements (including resources of external providers) can be identified by any member of the company at any time, usually in response to the needs of the business, and these needs are communicated to the Managing Director who will then decide if the need is justified and if so provide whatever resource is required.

Due to the small size and nature of the company most resource needs tend to be raised and addressed informally as they arise.

The Managing Director is solely responsible for all capital expenditures, should they arise.

Formally, resource requirements are discussed as part of the Management Review agenda where the results are recorded.

Specific resource provision relating to the elements of the Food Safety Management System are dealt with in the appropriate procedures contained in the Food Safety Manual, but are mainly dealt with as per the procedures contained in this section, as follows:

- Competence, Awareness And Knowledge
- Infrastructure
- Environment For The Operation Of Processes

7.1.2 – People

Firstplay Dietary Foods has determined and provides persons necessary to operate and maintain an effective Food Safety Management System are competent (see 7.2).

Firstplay Dietary Foods have engaged the assistance of external experts for the development, implementation, operation or assessment of the Food Safety Management System. Firstplay have signed agreement in place. Service Supplier Approval Risk Assessment defines the competency, responsibility and authority of external experts.

7.1.3 - Infrastructure

Firstplay Dietary Foods has determined, provided and maintains the infrastructure needed for the operation of its processes and to achieve product and service conformity.

- 1. Buildings and associated utilities
- 2. Equipment (including hardware and software)
- 3. Transportation resources

Infrastructure can include:



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

4. Information and communication technology.

The infrastructure of the company has been determined and provided by the Managing Director in response to business/product conformity/process needs or customer or other requirements. The current infrastructure is considered adequate for all present needs of the business. Infrastructure needs are discussed at the Management Review under 'Resource Requirements'. The responsibilities for maintaining the key elements of the infrastructure are as follows:

<u>Buildings and Site:</u> The company rents the business premises. Repairs and maintenance are the responsibility of the company Managing Director.

Utilities: Utilities are provided by the Managing Director.

Layouts: Warehouse and office layouts are the responsibility of the Managing Director.

<u>Staff & Employee Facilities:</u> Adequate and suitable staff and employee facilities are the responsibility of the Managing Director.

<u>IT Systems and Communications:</u> The company maintains a service contract with a specialist outside contractor for I.T. equipment, software and communications.

<u>Transport (external & internal)</u>: The responsibility for ensuring that company vehicles are correctly maintained, serviced, taxed, insured and MOT'd (as applicable) is that of the Managing Director.

<u>General Tools & Equipment:</u> The managing Director is responsible for the repair or replacement of hand-tools and equipment.

PROCESS EQUIPMENT MAINTENANCE:

The Managing Director is responsible for ensuring that process equipment is adequate and suitable to ensure product conformity. Generally, no maintenance or servicing is required for the equipment used by the company other than keeping reasonably clean, oiled, and up to date with Loler requirements. The company uses an external specialist company in the event of breakdown or necessary major maintenance / servicing.

7.1.4 - Work Environment

Firstplay Dietary Foods have determined, provide and maintain the resources for the establishment, management and maintenance of the work environment necessary to achieve conformity with the requirements of the Food Safety Management System.

7.1.5 – Externally Developed Elements of The Food Safety Management System

In the establishment, maintenance, updating and continually improvements of its Food Safety Management System, Firstplay Dietary Foods have used externally developed elements of the Food Safety Management System, including PRPs, the hazard analysis and the hazard control plan (see 8.5.4), Firstplay dietary Foods have ensured that the provided elements are:

- a) developed in conformance with requirements of this document.
- b) applicable to the sites, processes and products of the organization.
- c) specifically adapted to the processes and products of the organization by the food safety team.
- d) implemented, maintained and updated as required by this document.
- e) retained as documented information.



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

7.1.6 – Control of externally provided processes, products or services

Firstplay Dietary Foods have:

- a) established and applied criteria for the evaluation, selection, monitoring of performance and reevaluation of external providers of processes, products and/or services.
- b) ensured adequate communication of requirements any external providers
- c) ensured that externally provided processes, products or services do not adversely affect the organization's ability to consistently meet the requirements of the Food Safety Management System.
- d) retained documented information of these activities and any necessary actions as a result of the evaluations and re-evaluations.

ISO22000:2018 reference: 7.2 - Competence

Firstplay Dietary Foods have:

- a) determined the necessary competence of people, including external providers, doing work under its control that affects its food safety performance and effectiveness of its Food Safety Management System.
- b) ensured that these persons, including the food safety team and those responsible for the operation of the hazard control plan, are competent on the basis of appropriate education, training and/or experience.
- c) ensured that the food safety team has a combination of multi-disciplinary knowledge and experience in developing and implementing the Food Safety Management System (including, but not limited to, the organization's products, processes, equipment and food safety hazards within the scope of the Food Safety Management System.
- d) where applicable, taken actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken.
- e) retain appropriate documented information as evidence of competence.

ISO22000:2018 reference: 7.3 - Awareness

Firstplay Dietary Foods have ensured that all relevant persons doing work under the organization's control are aware of:

- a) the food safety policy
- b) the objectives of the Food Safety Management System relevant to their tasks
- c) their individual contribution to the effectiveness of the Food Safety Management System, including the benefits of improved food safety performance
- d) the implications of not conforming with the FSMS requirements.

ISO22000:2018 reference: 7.4 - Communication

7.4 – Firstplay Dietary Food has determined the internal and external communications relevant to the Food Safety Management System, including:

- a) on what it will communicate
- b) when to communicate
- c) with whom to communicate
- d) how to communicate
- e) who communicates



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Firstplay Dietary Foods shall ensure that the requirement for effective communication is understood by all persons whose activities have an impact on food safety.

Due to the size and nature of the business, the awareness of customer requirements is promoted throughout the company mainly on a verbal level but also can include the following:-

Verbal Communication

Procedures, Work Instructions & Associated Documentation

Customer Complaints

Internal Audits

E-Mail

Management Review

7.4.1 - External Communication

Firstplay Dietary Foods shall ensure that sufficient information is communicated externally and is available for interested parties of the food chain.

Firstplay Dietary Foods have established, implemented and maintained effective communications with:

- a) external providers and contractors
- b) customers and/or consumers, in relation to:
 - 1) product information related to food safety, to enable the handling, display, storage, preparation, distribution and use of the product within the food chain or by the consumer.
 - 2) identified foods safety hazards that need to be controlled by other organizations in the food chain and/or by consumers.
 - 3) contractual arrangements, enquiries and orders, including their amendments.
 - 4) customer and/or consumer feedback, including complaints.
- c) statutory and regulatory authorities;
- d) other organizations that have an impact on, or will be affected by, the effectiveness or updating of the FSMS.

Designated persons shall have defined responsibility and authority for the external communication of any information concerning food safety. Where relevant, information obtained through external communication shall be included as input for management review (see 9.3) and for updating the FSMS (see 4.4 and 10.3).

Evidence of external communication shall be retained as documented information.

External:

Customer Mail Shots (new products)
Sales and Accounts management (Emails and phone conversations)
Sales Meetings
Customer Visits
Internet
Quality Policy (on request).

7.4.2 - Internal Communication

Firstplay Dietary Foods have established, implemented and maintained an effective system for communicating issues having an impact on food safety.



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Firstplay Dietary Foods shall ensure that the food safety team is informed in a timely manner of changes in the following:

- a) products or new products;
- b) raw materials, ingredients and services;
- c) production systems and equipment;
- d) production premises, location of equipment and surrounding environment;
- e) cleaning and sanitation programmes;
- f) packaging, storage and distribution systems;
- g) competencies and/or allocation of responsibilities and authorizations;
- h) applicable statutory and regulatory requirements;
- i) knowledge regarding food safety hazards and control measures;
- j) customer, sector and other requirements that the organization observes;
- k) relevant enquiries and communications from external interested parties;
- l) complaints and alerts indicating food safety hazards associated with the end product;
- m) other conditions that have an impact on food safety.

The food safety team shall ensure that this information is included when updating the Food Safety Management System (see $\underline{4.4}$ and $\underline{10.3}$). Top management shall ensure that relevant information is included as input to the management review (see $\underline{9.3}$).

Communication takes place on a number of levels but within the company but tends to be informal because of the relatively small size of the business and low numbers of employees.

Internal:

Meetings called by the MD as and when required, mainly for information (discussion of new or proposed products, production / process methods, equipment, etc.

E-Mails (between staff and employees).

Management Review (all relevant

members of the company).

Customer Complaints (relevant members

of the company).

Internal Audit Results (relevant members

of the company)

Quality Objectives (relevant members of

the company).

ISO22000:2018 reference: 7.5 - Documented Information

7.5.1 – Firstplay Dietary Foods's Food Safety Management System includes:

- a) documented information required by ISO22000:2018 and FSSC 22000.
- b) documented information determined by the organization as being necessary for the effectiveness of the Food Safety Management System.
- c) documented information and food safety requirements required by statutory, regulatory authorities and customers.

7.5.2 - Creating and Updating.



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorisad Dv	TC

When creating and updating documented information, Firstplay Dietary Foods shall ensure appropriate:

- a) identification and description (e.g. a title, date, author, and reference number).
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic).
- c) review and approval for suitability and adequacy.

7.5.3 – Control of Documented Information

Documented information / records required by the Food Safety Management System and by ISO 22000: 20158 and FSSC 22000 is controlled to make sure:

- 1. It is available and suitable for use, where and when it is needed
- 2. It is adequately protected (for example from improper use, loss of confidentiality, loss of integrity, etc).

For the control of documented information / records, Firstplay Dietary Foods addresses the following activities, as applicable:

- 1. Distribution, access, retrieval and use
- 2. Storage and preservation, including preserving legibility
- 3. Control of changes (for example version control)
- 4. Retention times and disposition.

Documented information of external origin which has been determined by the company as being necessary for the planning and operation of the Integrated Management System is identified appropriately and is controlled.

Documented information which is retained as evidence of conformity is protected from unintentional alterations.

Document Control

Control of Critical Documents

The documents are controlled by means of a table in the page header detailing the document name, issue date and issue number.

Document and Data Approval and Issue

Documents in use will be authorised and the correct version. There will be controlled versions of all documents in the Quality Manual. In addition controlled check sheets will be printed from the controlled manual. Duplicate HACCP flow charts and HACCP protocols are also copied, relevant operatives will be trained and signed off against these. Copies will also be laminated and displayed in relevant areas of the warehouse, packing room or in files. Documents in use are also saved in the relevant folders on the Technical Managers computer.

Simple Documents

All documents are typed in a language that is simple and easy to understand. They cover enough details so that they can be used for training purposes and as a reference.

Document Changes



Title: Section 7 – Support	DOC No:	Section 7
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

All documents are controlled using a control mechanism which details the document name, issue date, issue number, pages and where necessary document reference code. This will normally be at the bottom of the page. When a document is updated, this document will be disposed of, dated with the date designated to the new issue and the reason for the change will be highlighted on the document. The **Document Amendment Register QAS4.0** is completed at the front of the manual.

Document Disposal

The Technical Manager is responsible for ensuring that the MASTER documentation remains in control. All old documents will be filed in an "Archive File" chronologically allowing documents changes to be tracked on the computer.

Where documents are stored electronically, these shall be stored securely and backed up weekly to prevent loss.

Record Completion and Maintenance

Record Completion and Maintenance

Records to demonstrate the control of product safety, legality and quality are maintained. There are no electronic records at present but master copies are stored and are backed up by the Site server.

Legible and Genuine

The Operatives and Managing Director who are required to complete documentation are aware of the need for the records to be legible and genuine.

Alterations

Any alterations to records can only be made by the Technical Advisor and a Managing Director, who will initial the change and record the reason for the change (e.g.) a mistake. The original record should be crossed out in such a way as to ensure it is still legible. The use of correction fluid/ tape is strictly forbidden.

Record Retention

Documentation shall be retained for a minimum of 3 years, which is at least 12 months past the longest period specified by the extended shelf life of the product.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

ISO22000:2018 reference: 8.1 – Operational Planning Controls

Firstplay Dietary Foods have planned, implemented, controlled, maintained and updated when required the processes needed to meet requirements for the realization of safe products, and to implement the actions determined in <u>6.1</u>, by:

- a) establishing criteria for the processes;
- b) implementing control of the processes in accordance with the criteria;
- c) keeping documented information to the extent necessary to have the confidence to demonstrate that the processes have been carried out as planned.

The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

The organization shall ensure that outsourced processes are controlled (see 7.1.6).

ISO22000:2018 reference: 8.2 – Prerequisite Programmes (PRPs)

Firstplay Dietary Foods have established, implemented, maintained and updated PRP(s) to facilitate the prevention and/or reduction of contaminants (including food safety hazards) in the products, product processing and work environment.

The PRP(s) are:

- a) appropriate to the organization and its context with regard to food safety;
- b) appropriate to the size and type of the operation and the nature of the products being manufactured and/or handled;
- c) implemented across the entire production system, either as programmes applicable in general or as programmes applicable to a particular product or process;
- d) approved by the food safety team.

When establishing PRP(s), Firstplay dietary Foods have ensured that applicable statutory, regulatory and mutually agreed customer requirements are identified. Consideration has been given to:

- a) the applicable part of the ISO/TS 22002 1-PRP-Food-safety-Food-manufacturing
- b) applicable standards, codes of practice and guidelines.
- c) FSSC22000 v6

Firstplay Dietary Foods have considered:

- a) construction, lay-out of buildings and associated utilities;
- b) lay-out of premises, including zoning, workspace and employee facilities;
- c) supplies of air, water, energy and other utilities;
- d) pest control, waste and sewage disposal and supporting services;
- e) the suitability of equipment and its accessibility for cleaning and maintenance;
- f) supplier approval and assurance processes (e.g. raw materials, ingredients, chemicals and packaging);
- g) reception of incoming materials, storage, dispatch, transportation and handling of products;
- h) measures for the prevention of cross contamination;
- i) cleaning and disinfecting;
- j) personal hygiene;
- k) product information/consumer awareness;
- l) others, as appropriate.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorisad By:	TE

Documented information shall specify the selection, establishment, applicable monitoring and verification of the PRP(s).

ISO22000:2018 reference: 8.3 - Traceability

The traceability system is able to uniquely identify incoming material from the suppliers and the first stage of the distribution route of the end product. Firstplay Dietary Food's traceability system includes as a minimum:

- a) traceability of received materials, ingredients and intermediate products to the end product.
- b) reworking of materials/products.
- c) distribution of the end product.

Firstplay Dietary Foods ensures applicable statutory, regulatory and customer requirements are identified.

Documented information as evidence of the traceability system is retained for a minimum of 12 months past the longest shelf life of the product.

The Traceability system effectiveness is tested forwards and backwards at least annually.

ISO22000:2018 reference: 8.4 – Emergency Preparedness and response 8.4.1

Top management at Firstplay Dietary Foods have documented procedures in place to respond to potential emergency situations or incidents that can have an impact on food safety which are relevant to the role of the organization in the food chain.

8.4.2 - Handling of Emergencies and Incidents

Firstplay Dietary Foods have in place documented procedures detailing how they will:

- a) respond to actual emergency situations and incidents by:
 - 1) ensuring applicable statutory and regulatory requirements are identified;
 - 2) communicating internally;
 - 3) communicating externally (e.g. suppliers, customers, appropriate authorities, media);
- b) take action to reduce the consequences of the emergency situation, appropriate to the magnitude of the emergency or incident and the potential food safety impact;
- c) periodically test procedures where practical;
- d) review and, where necessary, update the documented information after the occurrence of any incident, emergency situation or tests.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

ISO22000:2018 reference: 8.5 - Hazard Control

8.5.1 – Preliminary Steps to enable hazard analysis

To carry out the hazard analysis, preliminary documented information shall be is collected, maintained and updated by the food safety team. This include, but not be limited to:

- a) applicable statutory, regulatory and customer requirements;
- b) the organization's products, processes and equipment;
- c) food safety hazards relevant to the Food Safety Management System.

Characteristics of raw materials, ingredients and product contact materials:

Firstplay Dietary Foods ensure that all applicable statutory and regulatory food safety requirements are identified for all raw materials, ingredients and product contact materials.

Documented information concerning all raw materials, ingredients and product contact materials to the extent needed to conduct the hazard analysis (see <u>8.5.2</u>)is maintained by Firstplay dietary Foods, including the following, as appropriate:

- a) biological, chemical and physical characteristics;
- b) composition of formulated ingredients, including additives and processing aids;
- c) source (e.g. animal, mineral or vegetable);
- d) place of origin (provenance);
- e) method of production;
- f) method of packaging and delivery;
- g) storage conditions and shelf life;
- h) preparation and/or handling before use or processing;
- i) acceptance criteria related to food safety or specifications of purchased materials and ingredients appropriate to their intended use.

Characteristics of end products.

Firstplay Dietary Foods ensure that all applicable statutory and regulatory food safety requirements are identified for all the end products intended to be produced.

Firstplay Dietary foods maintain documented information concerning the characteristics of end products to the extent needed to conduct the hazard analysis (see <u>8.5.2</u>), including information on the following, as appropriate:

- a) product name or similar identification;
- b) composition;
- c) biological, chemical and physical characteristics relevant for food safety;
- d) intended shelf life and storage conditions;
- e) packaging;
- f) labelling relating to food safety instructions for handling, preparation and intended use;
- g) method(s) of distribution and delivery.

Intended use

The intended use, including reasonably expected handling of the end product and any unintended use but reasonably expected mishandling and misuse of the end product, shall be considered and



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TE

shall be maintained as documented information to the extent needed to conduct the hazard analysis (see 8.5.2).

Groups of consumers/users has been identified for each product.

Groups of consumers/users known to be especially vulnerable to specific food safety hazards has been identified.

Flow diagrams and description of processes

Preparation of the flow diagrams:

The food safety team have established, shall maintain and update flow diagrams as documented information for the products or product categories and the processes covered by the Food Safety Management System.

Flow diagrams are clear, accurate and sufficiently detailed to the extent needed to conduct the hazard analysis. Flow diagrams include the following:

- a) the sequence and interaction of the steps in the operation;
- b) any outsourced processes;
- c) where raw materials, ingredients, processing aids, packaging materials, utilities and intermediate products enter the flow;
- d) where reworking and recycling take place;
- e) where end products, intermediate products, by-products and waste are released or removed.

On-site confirmation of flow diagrams:

The food safety team confirm on-site the accuracy of the flow diagrams, update the flow diagrams where appropriate and retain as documented information.

Description of processes and process environment:

The food safety team have described, to the extent needed to conduct the hazard analysis:

- a) the layout of premises, including food and non-food handling areas;
- b) processing equipment and contact materials, processing aids and flow of materials;
- c) existing PRPs, process parameters, control measures (if any) and/or the strictness with which they are applied, or procedures that can influence food safety;
- d) external requirements (e.g. from statutory and regulatory authorities or customers) that can impact the choice and the strictness of the control measures.

The variations resulting from expected seasonal changes or shift patterns shall be included as appropriate.

The descriptions shall be updated as appropriate and maintained as documented information.

8.5.2 - Hazard Analysis

Hazard analysis, based on the preliminary information, to determine the hazards that need to be controlled has been conducted. The degree of control ensures food safety and, where appropriate, a combination of control measures shall be used.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Hazard identification and determination of acceptable levels

The Food Safety Team has identified and documented all food safety hazards that are reasonably expected to occur in relation to the type of product, type of process and process environment.

The identification shall be based on:

- a) the preliminary information and data collected
- b) experience
- c) internal and external information including, to the extent possible, epidemiological, scientific and other historical data;
- d) information from the food chain on food safety hazards related to the safety of the end products, intermediate products and the food at the time of consumption;
- e) statutory, regulatory and customer requirements.

Firstplay Dietary Foods identify step(s) (e.g. receiving raw materials, processing, distribution and delivery) at which each food safety hazard can be present, be introduced, increase or persist. When identifying hazards, the organization shall consider:

- a) the stages preceding and following in the food chain;
- b) all steps in the flow diagram;
- c) the process equipment, utilities/services, process environment and persons.

Firstplay Dietary Foods have determined the acceptable level in the end product of each food safety hazard identified, whenever possible.

When determining acceptable levels, the organization shall:

- a) ensure that applicable statutory, regulatory and customer requirements are identified;
- b) consider the intended use of end products;
- c) consider any other relevant information.

Firstplay Dietary Foods maintain documented information concerning the determination of acceptable levels and the justification for the acceptable levels.

Hazard assessment:

For each identified food safety hazard, a hazard assessment is conducted to determine whether its prevention or reduction to an acceptable level is essential. Firstplay Dietary Foods evaluate each food safety hazard with regard to:

- a) the likelihood of its occurrence in the end product prior to application of control measures;
- b) the severity of its adverse health effects in relation to the intended use (see 8.5.1.4).

Firstplay Dietary Foods have identified any significant food safety hazards.

The methodology used has been described, and the result of the hazard assessment are maintained as documented information.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Selection and categorization of control measure(s):

Based on the hazard assessment, Firstplay Dietary Foods have selected appropriate control measure or combination of control measures that will be capable of preventing or reducing the identified significant food safety hazards to defined acceptable levels.

Firstplay Dietary foods have categorized the control measures to be managed as OPRP's or CCPs.

The categorization shall be carried out using a systematic approach. For each of the control measures selected, there shall be an assessment of the following:

- a) the likelihood of failure of its functioning;
- b) the severity of the consequence in the case of failure of its functioning; this assessment shall include:
 - 1) the effect on identified significant food safety hazards;
 - 2) the location in relation to other control measure(s);
 - 3) whether it is specifically established and applied to reduce the hazards to an acceptable level;
 - 4) whether it is a single measure or is part of combination of control measure(s).

In addition, for each control measure, the systematic approach shall include an assessment of the feasibility of:

- a) establishing measurable critical limits and/or measurable/observable action criteria;
- b) monitoring to detect any failure to remain within critical limit and/or measurable/observable action criteria;
- c) applying timely corrections in case of failure.

The decision-making process and results of the selection and categorization of the control measures shall be maintained as documented information.

External requirements (e.g. statutory, regulatory and customer requirements) that can impact the choice and the strictness of the control measures shall also be maintained as documented information.

8.5.3 - Validation of Control Measures

The food safety team have validated that the selected control measures are capable of achieving the intended control of the significant food safety hazard(s). This validation shall be done prior to implementation of control measure(s) and combinations of control measures to be included in the hazard control plan (see 8.5.4) and after any change therein (see 7.4.2, 7.4.3, 10.2 and 10.3). When the result of validation shows that the control measures(s) is (are) not capable of achieving the intended control, the food safety team shall modify and re-assess the control measure(s) and/or combination(s) of control measure(s).

The food safety team shall maintain the validation methodology and evidence of capability of the control measure(s) to achieve the intended control as documented information.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

8.5.4 - Hazard Control Plan

Firstplay Dietary Foods have established, implement and maintain a hazard control plan including the following information for each control measure at each CCP or OPRP:

- a) food safety hazard(s) to be controlled at the CCP or by the OPRP;
- b) critical limit(s) at CCP or action criteria for OPRP;
- c) monitoring procedure(s);
- d) correction(s) to be made if critical limits or action criteria are not met;
- e) responsibilities and authorities;
- f) records of monitoring.

Determination of critical limits and action criteria:

Critical limits at CCPs and action criteria for OPRPs have been specified. The rationale for their determination shall be maintained as documented information.

Critical limits at CCPs are measurable. Conformance with critical limits ensures that the acceptable level is not exceeded.

Action criteria for OPRPs is measurable or observable. Conformance with action criteria contributes to the assurance that the acceptable level is not exceeded.

Monitoring systems at CCPs and for OPRPs

At each CCP, a monitoring system has been established for each control measure or combination of control measure(s) to detect any failure to remain within the critical limits. The system includes all scheduled measurements relative to the critical limit(s).

For each OPRP, a monitoring system has been established for the control measure or combination of control measure(s) to detect failure to meet the action criterion.

The monitoring system, at each CCP and for each OPRP, consists of documented information, including:

- a) measurements or observations that provide results within an adequate time frame;
- b) monitoring methods or devices used;
- c) applicable calibration methods or, for OPRPs, equivalent methods for verification of reliable measurements or observations (see <u>8.7</u>);
- d) monitoring frequency;
- e) monitoring results;
- f) responsibility and authority related to monitoring;
- g) responsibility and authority related to evaluation of monitoring results.

At each CCP, the monitoring method and frequency is capable of timely detection of any failure to remain within critical limits, to allow timely isolation and evaluation of the product (see <u>8.9.4</u>).

For each OPRP, the monitoring method and frequency is proportionate to the likelihood of failure and the severity of consequences.

When monitoring an OPRP is based on subjective data from observations (e.g. visual inspection), the method shall be supported by instructions or specifications.



Title: Section 8 – Operation	DOC No:	Section 8
·	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Actions when critical limits or action criteria are not met:

Firstplay Dietary Foods has specified corrections (see 8.9.2) and corrective actions (see 8.9.3) to be taken when critical limits or action criterion are not met ensure that:

- a) the potentially unsafe products are not released (see 8.9.4);
- b) the cause of nonconformity is identified;
- c) the parameter(s) controlled at the CCP or by the OPRP is (are) returned within the critical limits or action criteria;
- d) recurrence is prevented.

Firstplay Dietary Foods make corrections in accordance with 8.9.2 and corrective actions in accordance with 8.9.3.

Implementation of the hazard control plan

Firstplay Dietary Foods have implemented and maintained the hazard control plan, and retain evidence of the implementation as documented information.

ISO22000:2018 reference: 8.6 – Updating the Information specifying the PRP's and the hazard control plan

Firstplay Dietary Foods update the following information, if necessary:

- a) characteristics of raw materials, ingredients and product-contact materials
- b) characteristics of end products
- c) intended use
- d) flow diagrams and descriptions of processes and process environment.

Following changes, Firstplay Dietary Foods shall ensure that the hazard control plan and/or the PRP(s) are up to date.

ISO22000:2018 reference: 8.7 - Control of monitoring and measuring

The organization shall provide evidence that the specified monitoring and measuring methods and equipment in use are adequate for the monitoring and measuring activities related to the PRP(s) and the hazard control plan.

The monitoring and measuring equipment used shall be:

- a) calibrated or verified at specified intervals prior to use;
- b) adjusted or re-adjusted as necessary;
- c) identified to enable the calibration status to be determined;
- d) safeguarded from adjustments that would invalidate the measurement results;
- e) protected from damage and deterioration.

The results of calibration and verification is retained as documented information. The calibration of all the equipment is traceable to international or national measurement standards; where no standards exist, the basis used for calibration or verification shall be retained as documented information.

Firstplay Dietary Foods assess the validity of the previous measurement results when the equipment or process environment is found not to conform to requirements. Firstplay Dietary Foods take appropriate action in relation to the equipment or process environment and any product affected by the nonconformance.

The assessment and resulting action is maintained as documented information.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Software used in monitoring and measuring within the Food Safety Management System shall be validated by the Firstplay Dietary Foods, software supplier or third party prior to use. Documented information on validation activities shall be maintained by the organization and the software shall be updated in a timely manner.

Whenever there are changes, including software configuration/modifications to commercial off-the-shelf software, they shall be authorized, documented and validated before implementation.

ISO22000:2018 reference: 8.8 – Verification related to PRPs and the Hazard 8.8.1 Verification

The organization shall establish, implement and maintain verification activities. The verification planning shall define purpose, methods, frequencies and responsibilities for the verification activities.

The verification activities shall confirm that:

- a) the PRP(s) are implemented and effective;
- b) the hazard control plan is implemented and effective;
- c) hazard levels are within identified acceptable levels;
- d) input to the hazard analysis is updated;
- e) other actions determined by the organization are implemented and effective.

Verification activities are not carried out by the person responsible for monitoring the same activities.

Verification results shall be retained as documented information and shall be communicated. Where verification is based on testing of end product samples or direct process samples and where such test samples show nonconformity with the acceptable level of the food safety hazard (see 8.5.2.2), the organization shall handle the affected lot(s) of product as potentially unsafe (see 8.9.4.3) and apply corrective actions in accordance with 8.9.3.

The food safety team shall conduct an analysis of the results of verification that shall be used as an input to the performance evaluation of the Food Safety Management System (see 9.1.2).

ISO22000:2018 reference: 8.9 - Control of Product and process Non Conformities

8.9.1 - Data derived from the monitoring of OPRPs and at CCPs are evaluated by designated persons who are competent and have the authority to initiate corrections and corrective actions.

8.9.2 - Corrections

When critical limits at CCP(s) and/or action criteria for OPRPs are not met, the products affected are identified and controlled with regard to their use and release.

Control of Non Conforming Product Procedure includes:

- a) a method of identification, assessment and correction for affected products to ensure their proper handling;
- b) arrangements for review of the corrections carried out.

When critical limits at CCPs are not met, affected products are identified and handled as potentially unsafe products (see <u>8.9.4</u>).



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Where action criteria for an OPRP are not met, the following shall be carried out:

- a) determination of the consequences of that failure with respect to food safety;
- b) determination of the cause(s) of failure;
- c) identification of the affected products and handling in accordance with 8.9.4.

The organization shall retain results of the evaluation as documented information.

Non conformities are recorded on Non Conformance Report detailing corrections made on nonconforming products and processes, including:

- a) the nature of the nonconformity;
- b) the cause(s) of the failure;
- c) the consequences as a result of the nonconformity.

8.9.3 - Corrective actions

The need for corrective actions shall be evaluated when critical limits at CCP(s) and/or action criteria for OPRPs are not met.

Corrective Actions Procedure specifies appropriate actions to identify and eliminate the cause of detected nonconformities, to prevent recurrence, and to return the process to control after a nonconformity is identified.

These actions shall include:

- a) reviewing nonconformities identified by customer and/or consumer complaints and/or regulatory inspection reports;
- b) reviewing trends in monitoring results that can indicate loss of control;
- c) determining the cause(s) of nonconformities;
- d) determining and implementing actions to ensure that nonconformities do not recur;
- e) documenting the results of corrective actions taken;
- f) verifying corrective actions taken to ensure that they are effective.

This is recorded on Non Conformance Report.

8.9.4 - Handling of potentially unsafe products

Firstplay Dietary Foods shall take action(s) to prevent potentially unsafe products from entering the food chain, unless it can demonstrate that:

- a) the food safety hazard(s) of concern is (are) reduced to the defined acceptable levels;
- b) the food safety hazard(s) of concern will be reduced to identified acceptable levels prior to entering the food chain; or
- c) the product still meets the defined acceptable level(s) of the food safety hazard(s) of concern despite the nonconformity.

Products that have been identified as potentially unsafe are labelled as On Hold until the products have been evaluated and the disposition has been determined.

If products that have left the control of the organization are subsequently determined to be unsafe, the organization shall notify relevant interested parties and initiate a withdrawal/recall (see 8.9.5). The controls and related responses from relevant interested parties and authorization for dealing with potentially unsafe products shall be retained as documented information.

Evaluation for release:

Each lot of products affected by the nonconformity shall be evaluated.

Products affected by failure to remain within critical limits at CCPs shall not be released, but shall be handled in accordance with 8.9.4.3.



Title: Section 8 – Operation	DOC No:	Section 8
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Products affected by failure to meet action criterion for OPRPs shall only be released as safe when any of the following conditions apply:

- a) evidence other than the monitoring system demonstrates that the control measures have been effective;
- b) evidence shows that the combined effect of the control measures for that particular product conforms to the performance intended (i.e. identified acceptable levels);
- c) the results of sampling, analysis and/or other verification activities demonstrate that the affected products conform to the identified acceptable levels for the food safety hazard(s) concerned.

Results of evaluation for release of products shall be retained as documented information.

Products that are not acceptable for release are:

- a) reprocessed or further processed within or outside the organization to ensure that the food safety hazard is reduced to acceptable levels; or
- b) redirected for other use as long as food safety in the food chain is not affected; or
- c) destroyed and/or disposed as waste.

Documented information on the disposition of nonconforming products, including the identification of the person(s) with approving authority shall be retained.

8.9.5 - Withdrawal/recall

Firstplay Dietary Foods are able to ensure the timely withdrawal/recall of lots of end products that have been identified as potentially unsafe, by appointing competent person(s) having the authority to initiate and carry out the withdrawal/recall.

Firstplay Dietary Foods have Product Withdrawal and Recall Procedure detailing:

- a) notifying relevant interested parties (e.g. statutory and regulatory authorities, customers and/or consumers);
- b) handling withdrawn/recalled products as well as products still in stock;
- c) performing the sequence of actions to be taken.

Withdrawn/recalled products and end products still in stock shall be secured or held under the control of the organization until they are managed in accordance with 8.9.4.3.

The cause, extent and result of a withdrawal/recall shall be retained as documented information and reported to the top management as input for the management review (see 9.3).

Firstplay Dietary Foods verify the implementation and effectiveness of withdrawals/recalls by completing a mock withdrawal/recall or practice withdrawal/recall) and retain documented information at lease annually.



Title: Section 9 –
Performance Evaluation

DOC No:	Section 9
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 9.1 – Monitoring, Measuring, Analysis and Evaluation

- **9.1.1** Firstplay Dietary Foods has determined:
- a) what needs to be monitored and measured;
- b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;
- c) when the monitoring and measuring shall be performed;
- d) when the results from monitoring and measurement shall be analysed and evaluated;
- e) who shall analyse and evaluate the results from monitoring and measurement.

The organization shall retain appropriate documented information as evidence of the results.

The organization shall evaluate the performance and the effectiveness of the Food Safety Management System.

9.1.2 - Analysis and evaluation

Firstplay Dietary Foods analyse and evaluate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the hazard control plan (see <u>8.8</u> and <u>8.5.4</u>), the internal audits (see <u>9.2</u>) and external audits.

The analysis shall be carried out:

- a) to confirm that the overall performance of the system meets the planned arrangements and the Food Safety Management System requirements established by the organization;
- b) to identify the need for updating or improving the Food Safety Management System;
- c) to identify trends which indicate a higher incidence of potentially unsafe products or process failures;
- d) to establish information for planning of the internal audit programme related to the status and importance of areas to be audited;
- e) to provide evidence that corrections and corrective actions are effective.

The results of the analysis and the resulting activities shall be retained as documented information. The results shall be reported to top management and used as input to the management review (see

9.3) and the updating of the Food Safety Management System (see 10.3).

ISO22000:2018 reference: 9.2 Internal Audit

- **9.2.1** Firstplay Dietary Foods shall conduct internal audits at planned intervals to provide information on whether the Food Safety Management System:
- a) conforms to:
 - 1) the organization's own requirements for its Food Safety Management System;
 - 2) the requirements of this document;
- b) is effectively implemented and maintained.

9.2.2 Firstplay Dietary Foods have:

- a) planed, established, implemented and maintained (an) audit programme(s), including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned, changes in the Food Safety Management System, and the results of monitoring, measurement and previous audits;
- b) define the audit criteria and scope for each audit;
- c) select competent auditors and conduct audits to ensure objectivity and the impartiality of the audit process;



Title: Section 9 –
erformance Evaluation

DOC No:	Section 9
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

- d) ensure that the results of the audits are reported to the food safety team and relevant management;
- e) retain documented information as evidence of the implementation of the audit programme and the audit results;
- f) make the necessary correction and take the necessary corrective action within the agreed time frame:
- g) determine if the Food Safety Management System meets the intent of the food safety policy (see 5.2) and objectives of the Food Safety Management System (see 6.2).

Follow-up activities by the organization shall include the verification of the actions taken and the reporting of the verification results.

Audit Schedule

This Food Safety Management System has been fully audited and re-written to conform to the ISO22000 and FSSC standard requirements, and thereafter audits are conducted in accordance to the **Audit Schedule QMS2.0** throughout the year to ensure each area is audited at least annually.

Auditors

Internal audits are completed by Production Manager who is a competent, qualified auditor who is independent of the systems under audit.

Records

The Audit Schedule and records of the audits are maintained, whether these are in typed or handwritten format. These are simple in format and clearly show compliance or non-compliance and any objective evidence of the procedure under audit.

Audit Result

Any non-conformances resulting from the audit will be noted on the **Internal Audit Report,** and a non conformance report shall be completed in accordance with Clause 3.7. A copy of the report given to all personnel responsible for the activity audited.

Corrective Actions

Timescales for corrective actions are agreed with the person responsible and corrective actions are closed out on this report and on a Non-Conformance Report

Documented Audit

All audit results are filed with copies of any relevant weeks check sheets in the Audit File or if a Non Conformance Report is generated this will be filed in the designated non conformance file. The results of internal audits and corrective actions are discussed at the monthly Management Meetings.

Factory Hygiene and Fabrication Inspections

These are carried out by the internal auditor to ensure that factory environment and processing equipment(e.g. doors, walls, ceilings, facilities and equipment) is maintained in a suitable condition for food production. The results are reported to personnel responsible for the activity audited, with corrective actions, time scales agreed, and completion verified. These inspections are carried out monthly and conformances, non conformances and root causes are recorded on **Monthly GMP and Fabric Audit**. A summary of the results is presented at the monthly management review meetings.



Title: Section 9 –
Performance Evaluation

DOC No:	Section 9
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 9.3 Management Review

9.3.1 - Top management shall review the organization's Food Safety Management System, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

9.3.2 - Management review input

The management review shall consider:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the Food Safety Management System, including changes in the organization and its context (see 4.1);
- c) information on the performance and the effectiveness of the Food Safety Management System, including trends in:
 - 1) result(s) of system updating activities (see 4.4 and 10.3);
 - 2) monitoring and measurement results;
 - 3) analysis of the results of verification activities related to PRPs and the hazard control plan (see 8.8.2);
 - 4) nonconformities and corrective actions;
 - 5) audit results (internal and external);
 - 6) inspections (e.g. regulatory, customer);
 - 7) the performance of external providers;
 - 8) the review of risks and opportunities and of the effectiveness of actions taken to address them (see 6.1);
 - 9) the extent to which objectives of the Food Safety Management System have been met;
- d) the adequacy of resources;
- e) any emergency situation, incident (see 8.4.2) or withdrawal/recall (see 8.9.5) that occurred;
- f) relevant information obtained through external (see <u>7.4.2</u>) and internal (see <u>7.4.3</u>) communication, including requests and complaints from interested parties;
- g) opportunities for continual improvement.

The data shall be presented in a manner that enables top management to relate the information to stated objectives of the Food Safety Management System.

9.3.3 - Management review output

The outputs of the management review shall include:

- a) decisions and actions related to continual improvement opportunities;
- b) any need for updates and changes to the Food Safety Management System, including resource needs and revision of the food safety policy and objectives of the Food Safety Management System.

Thes are minuted on Annual Management Review meeting Minutes, and Monthly Management review Minutes.



Title: Section 10 – Improvement

DOC No:	Section 10
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

ISO22000:2018 reference: 10 Improvement

10.1 - Nonconformity and corrective action

When a nonconformity occurs, the Firstplay Dietary Foods shall:

- a) react to the nonconformity and, as applicable:
 - 1) take action to control and correct it;
 - 2) deal with the consequences;
- b) evaluate the need for action to eliminate the cause(s) of the nonconformity, in order that it does not recur or occur elsewhere, by:
 - 1) reviewing the nonconformity;
 - 2) determining the causes of the nonconformity;
 - 3) determining if similar nonconformities exist, or could potentially occur;
- c) implement any action needed;
- d) review the effectiveness of any corrective action taken;
- e) make changes to the Food Safety Management System, if necessary.

Corrective actions shall be appropriate to the effects of the nonconformities encountered.

Firstplay Dietary Foods retain documented information as evidence of:

- a) the nature of the nonconformities and any subsequent actions taken;
- b) the results of any corrective action.

Opportunities for improvement can be identified from a number of sources at various levels and in all areas of the business relevant to the Quality Management System, the production processes, products and services.

Opportunities for improvement are not confined to current needs but can also be considerations for future needs and expectations (requirements).

The company recognises that improvement can come in different ways, not just on an ongoing basis (e.g. continual improvement). Improvements may therefore be recorded as **Quality Objectives**, results of **Nonconformance and Corrective Action** (recorded on **Nonconformance Forms**), actions resulting from process changes (**Knowledge File**), **Actions taken to Address Risks and Opportunities**, **Internal Audits** or as part of **Continual Improvement**.

Operations personnel perform continuous visual checks during assembly (for component damage, etc,) and a final post-assembly physical check (e.g. a "fit for purpose" check), normally at the packing stage.

Unacceptable or suspect product is either immediately rectified as part of the process or is placed to one side and identified with a **HOLD** notice awaiting a decision on disposition.

Goods returned are considered to be "expressions of customer dissatisfaction" and are treated in the same way as formal **Customer Complaints**.

All such occurrences are recorded on a **Nonconformance Form**.

The **Nonconformance Form** records the problem, the corrective action taken, and the result of that action (its effectiveness). **Nonconformance Forms** are retained for a minimum of one year.

Corrective Actions include any actions taken to prevent recurrence of the problem. This may involve ascertaining the **root cause** of the problem.

NOTE: the **root cause** of the problem may not be apparent at the time of the initial corrective action as root causes often do not become apparent until sufficient data to perform an analysis of trends is available, usually for the Management Review. Actions to eliminate or minimise the effects of root causes therefore may be in the form of Quality Objectives generated from the Management Review.



Title: Section 10 – Improvement

DOC No:	Section 10
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Typically, root causes tend to be such management issues as Competence, Poor Planning, Poor Communication, Suppliers, etc.

Pertinent Corrective Action information is analysed, summarised and presented to the **Management Review** as a source of potential opportunities for improvement.

10.2 - Continual improvement

Firstplay Dietary Foods shall continually improve the suitability, adequacy and effectiveness of the Food Safety Management System.

Top management shall ensure that the organization continually improves the effectiveness of the Food Safety Management System through the use of communication (see <u>7.4</u>), management review (see <u>9.3</u>), internal audit (see <u>9.2</u>), analysis of results of verification activities (see <u>8.8.2</u>), validation of control measure(s) and combination(s) of control measure(s) (see <u>8.5.3</u>), corrective actions (see <u>8.9.3</u>) and Food Safety Management System updating (see <u>10.3</u>).

10.3 - Update of the food safety management system

Firstplay Dietary Foods shall ensure that the Food Safety Management System is continually updated. To achieve this, the food safety team shall evaluate the Food Safety Management System at planned intervals. The team shall consider whether it is necessary to review the hazard analysis (see 8.5.2), the established hazard control plan (see 8.5.4) and the established PRPs (see 8.2). The updating activities shall be based on :

- a) input from communication, external as well as internal (see 7.4);
- b) input from other information concerning the suitability, adequacy and effectiveness of the Food Safety Management System;
- c) output from the analysis of results of verification activities (see 9.1.2);
- d) output from management review (see <u>9.3</u>).

System updating activities shall be retained as documented information and reported as input to the management review (see <u>9.3</u>).



Title: Construction and
Layout of the Buildings

DOC No:	PRP 4.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Location

The **Firstplay Dietary Foods** site is located and maintained to prevent contamination and thereby enables the Company to produce quality, safe, authentic, and legal products.

Adverse Local Activities

The surrounding buildings or companies do not have an adverse impact, and the perimeter of the site is adequately covered with bait points.

Site Boundaries

The site is situated in an industrial estate setting surrounded by purpose-built units.

Perimeter and Grounds

The ground surrounding the building is concreted and finished and maintained to an appropriate standard and where possible to at least 1 metre from the walls ensuring that there are no grassed areas against factory walls.

Yards and driveways surrounding the main building are maintained in good condition and are well drained to facilitate easy cleaning to prevent contamination.



Title: Layout, Premises
and Workspace

DOC No:	PRP 5.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Layout, Product Flow and Segregation

The processing, packing and storage premises of **Firstplay Dietary Foods** has been designed, constructed and is maintained to control the risk of product contamination and complies with all current legislation.

Site Plan

Process Flow – Intake – Packing – Storage – Despatch.

The process flow from the intake of all raw materials and ingredients until the despatch of packed product to customers is designed and controlled to prevent product contamination.

There are designated raw material, packaging and finished product stores. These are segregated from production areas with physical barriers.

The Site Map includes:

Production Risk Zones

The packing process flow

The route for the movement of waste

The route for the removal of rework

Access points for personnel

Access points for raw materials (including packaging)

Route of movement of raw material

Location of any staff facilities including changing rooms, toilets, canteens and smoking areas.

The process flow also includes the movement of waste and rework in Site Plan QMS4.0.

Visitors to Site

All Visitors and Contractors (including drivers) report to reception and sign in when they arrive on site and complete the Visitors and Contractors Health Questionnaire in conjunction with reading the general site hygiene rules and those areas more specific to contractors. The contractors will be under the supervision of Company personnel.

Contamination Risks

The systems of working and control, including segregation implemented reduce the potential for physical, chemical or microbiological contamination and take into account product flow, nature of the materials, equipment, personnel, waste and utilities provision. No Products containing allergens are processed on site.

Product Segregation

The product flow and equipment layout is such that potential contamination is minimised.

Working Space and Capacity

Consideration has been given to working space and storage capacity to ensure this is adequate enough to enable operations to be carried out properly under safe and hygienic conditions.

Building Fabric - Raw Material Handling, Preparation, Processing, Packing and Storage Areas

The fabrication of the site, buildings and facilities are suitable for the intended purpose.

Walls

All walls have been designed, constructed, finished and maintained to:

- o Prevent the accumulation of dirt
- Minimise condensation
- o Prevent mould growth.
- o Facilitate ease of cleaning.

All wall/ floor junctions and corners facilitate ease and thoroughness of cleaning.

Floors



Title: Layout, Premises	
and Workspace	

DOC No:	PRP 5.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

All floors are designed to meet the demands of the process and are unaffected by any cleaning materials and methods. They are sealed concrete or tiled impervious and in good repair. Floor junctions are rounded on processing areas.

Ceilings and Overheads

Ceilings and overheads have been designed, finished and maintained to prevent the accumulation of dirt, to reduce condensation and mould growth and to facilitate cleaning. They are constructed of food approved panels, metal panels and cleansable paint.

Suspended Ceilings

There are no suspended ceilings.

Windows

Where windows in the production or storage areas open to the outside, they are screened to prevent pest ingress.

Doors

The doors to external are only opened when in use and are closed immediately after. Adequate screening is provided when external doors to processing, packing and storage areas are opened. This includes plastic/metal fly screen curtains and bristle strips at the bottom of the doors. All precautions are taken to prevent pest ingress.

Internal doors are constructed of food grade plastic or sealed wood which are cleaned and checked regularly. External doors are constructed of food grade plastic or sealed wood, their condition is regularly checked and they are adequately proofed.

Strip Curtains

Where plastic strip curtains are present, these shall be maintained in good condition, clean, fitted correctly (e.g.to prevent pest ingress or for temperature control), and shall not pose a food safety risk)

Location of equipment

Equipment is designed and located so as to facilitate good hygiene practices and monitoring. Equipment is located to permit access for operation, cleaning and maintenance.

Laboratory Facilities

There are no on site Laboratory facilities.

Temporary Structures and Vending Machines.

These are either avoided or limited to weekends, but were unavoidable during operational hours due to building work or refurbishment all such structures are cordoned off with blue sheeting and any breach in the external fabric is sealed each evening, secured and positioned to avoid pest harbourage.

No mobile premises are used.

Vending machines, where provided, are located in staff canteen and are maintained by vending contract.

Storage

Storage of raw materials and finished products are covered in Storage Procedure QPS29.0.



Title: Layout, Premises
and Workspace

DOC No:	PRP 5.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Temperature Control

Temperature controlled storage of raw materials and finished products are covered in **Storage Procedure QPS29.0**. Ambient, chilled and Frozen materials are stored.

There is no controlled Atmosphere Storage is in place.

All raw materials and finished products are stored on site. No outside storage is used.

All raw materials and products are stored off the floor on pallets or in racking. There is Sufficient space provided between the materials and the wall to allow inspection and pest control activities to be carried out.

Receipt Documents and Stock Rotation

The raw material and finished product stores are controlled by a manual stock control system and designed to facilitate first in first out procedures. Limited stocks are held on site and weekly, monthly and annual stock checks.

Control of Stock Rotation

Raw materials are ordered from approved suppliers. All raw material deliveries are given a sequential stock number (GRN) to aid stock control. All finished products are coded and recorded on a manual system.

There is also a weekly stock take/ inventory of all stock items.

All cleaning chemicals are suitable for food use, purchased from approved suppliers and have a COSHH assessment carried out as part of the Health and Safety procedures. All chemicals used in the packing and storage areas are food approved and listed on the **Supplier Approval and Vulnerability Assessment QAS3.1**, have material safety data sheets, specifications, are taint free, are clearly labelled and are safely stored in a locked designated area with their issue strictly controlled and monitored. This is documented on **Chemical Procedure QPS8.0**.



Title: Utilities – Air, Water and Energy

DOC No:	PRP 6.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Water Supplies

Water used for cleaning and as an ingredient which is drawn from a mains supply and the Water Authority's annual report is held on file.

Mains cold-water samples are routinely taken according to the water-sampling regime annually and are sent to the contracted laboratory for microbiological analysis.

Water storge tanks or silos are not in use.

No Chlorinated water is used.

Water Plan

There is a detailed plan of the water distribution system **Site Plan QMS4.0** which includes the sampling points.

Non Potable Water

All water used on site is potable and the Water Authority's annual report is held on file.

Ice and Steam

No Ice or steam is used as an ingredient or in contact with foods or product surfaces.

Boiler Chemicals

No boiler chemicals are used.

Air and Ventilation

Firstplay Dietary Foods has determined no requirements for filtration, humidity (RH%) and microbiology As there is no air used as an ingredient or for direct product contact. Where temperature and/or humidity are deemed critical by the organization, a control system shall be put in place and monitored

Appropriate Adequate Ventilation and extraction is provided in all areas of product storage, processing and packing to remove excess or unwanted steam, dust and odours, and to facilitate drying after wet cleaning.

Room air supply quality shall be controlled to minimize risk from airborne microbiological contamination. Protocols for air quality monitoring and control shall be established in areas where products which support the growth or survival of microorganisms are exposed.

Exterior air intake ports are examined periodically for physical integrity.

Compressed and other Gases

No compressed air or other gasses Air are used inContact with foods or product surfaces.

Lighting

Adequate lighting is provided in all work areas.

Light fixtures are protected by sheaths or diffusers to ensure that materials, product or equipment are not contaminated in the case of breakages.



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DOC No:	PRP 7.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Waste/Waste Disposal

All waste removed from site is by approved specialist contractors.

Waste Disposal

External contractors are used only:

General: Environmental Waste Controls

Hazardous Waste: Environmental Waste Controls

Disposal contracts are kept on file and reviewed annually as part of the internal programme.

The internal waste must be kept in the designated marked containers provided.

Waste from open product areas is collected into bags, tied and transferred to external waste containers. Waste is placed into lidded skips and removed.

Waste Containers

Containers for waste and inedible or hazardous substances are:

- clearly identified for their intended purpose;
- located in a designated area;
- constructed of impervious material which can be readily cleaned and sanitized,
- closed when not in immediate use;
- locked where the waste may pose a risk to the product.

Waste Categorisation

General Non Hazardous Waste Wheelie Bin into located at Main Roller Shutter Door.

Hazardous Waste Placed into sealable polymer container which is labelled 'Hazardous Waste'

Stored next to Non Hazardous Wheelie Bin located at main Roller Shutter

Door and is collected on request when container is full.

Cardboard Non Hazardous Waste Wheelie Bin into located at Main Roller Shutter Door.

Glass Liner in Glass Breakage Kit.

Disposal of Trademarked or unsafe products

All trademarked unsafe products are disposed of as hazardous waste by the external waste company and a waste transfer note is retained detailing the weight disposed of. All material are removed from original packaging prior to disposal.

Drainage

Drains are designed to flow efficiently.

Drains shall do not pass over processing lines.

Drainage direction flows from clean areas outwards. Drains do not flow from a contaminated area to a clean area.



Title: Equipment	
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DOC No:	PRP 8.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Equipment

All equipment used by **Firstplay Dietary Foods** is suitably designed for its designated purpose and is operated to minimise the risk of product contamination. Firstplay Dietary Foods shall ensure a documented purchase specification for any new equipment detailing the site requirements for the equipment is obtained. This may, for example, include:

- any relevant legislation
- where applicable, requirements for food contact surfaces to meet legal requirements
- details of intended use of the equipment and the type of materials it will be handling.

Depending on its intended use, new equipment to site (including second-hand equipment) may require authorisation from a multi-disciplinary team.

The equipment supplier will provide evidence that equipment meets these site requirements prior to supply.

Specification

All equipment used by **Firstplay Dietry Foods** is constructed of food approved materials such as stainless steel and poly propylene. All equipment is positioned to allow access under, inside and around it for ease of cleaning and servicing.

Equipment is designed so it can be adequately maintained, serviced and operated by experienced and correctly trained personnel external service personnel to enable **Firstplay Dietry Foods** to produce safe and legal products.

Food Contact Suitability

All new equipment will either have a certificate of conformity to confirm their suitability for contact with food or have been risk assessed by the site team in conjunction with the external consultant to confirm suitability. Firstplay Dietry Foods has completed a risk assessment on the design and construction all food contact material, including seals and welding, where there may be a risk of foreign body, microbial, or allergenic contamination.

Equipment Commissioning Procedure

Firstplay Dietry Foods has the following equipment commissioning procedure:

Prior to the equipment entering full use in production Firstplay Dietry Foods shall:

Review the HACCP plan, and based on risk assess the equipment.

Set up a maintenance program based upon risk assessment and added to the **maintenance Schedule.**

Staff are trained in the use of the equipment including strip down procedures.

Cleaning procedures are to be produced and trained to relevant staff.

Firstplay Dietry Foods have implemented **The Movement of Static Equipment Procedure** to manage the movement of static equipment in production areas, to ensure that food safety is managed and the integrity of the equipment is maintained.

Equipment that is not used is taken out of service shall be cleaned and stored in a manner that does not pose a risk to the product. Where equipment is stored in internal production and storage areas shall be kept clean.

Food contact equipment that has been stored but is not in daily use shall be cleaned and disinfected prior to use.

Mobile equipment (e.g. forklift trucks, pallet trucks, scissor lifts and ladders) used in open product areas shall not pose a risk to the product, are kept captive to open product areas, and are maintained clean.



Title: Equipment	DOC No:	PRP 8.0
	Effective Date:	01.03.25
	Revision No:	01

Authorised By:

TF

Where the use of mobile equipment in external areas cannot be avoided and poses a risk to the product, the equipment shall be cleaned and disinfected prior to entering production areas.

Battery-charging equipment is stored in open product areas, but are fully sealed and maintenance free and do not pose a risk to products.

Maintenance

Firstplay Dietary Foods has implemented a system of planned maintenance for all equipment that is critical to product safety, legality and quality.

Planned Maintenance

Equipment, including fixtures and fittings, are maintained in such a condition as to minimise the risk of product contamination. To aid this, the GMP audit and pre-production audits are also designed to highlight any deficiencies in the standard of equipment maintenance. Only minor maintenance activities are undertaken on site, most of the equipment is serviced by the manufacturer.

If the maintenance operation cannot be carried out without jeopardising the safety and legality of the product, such operations will not be carried out during production. Maintenance details are recorded on the **Maintenance Report.**

If new plant is to be commissioned a maintenance program is set up based upon risk assessment and added to the **Preventative Maintenance Schedule**

Equipment Breakdown

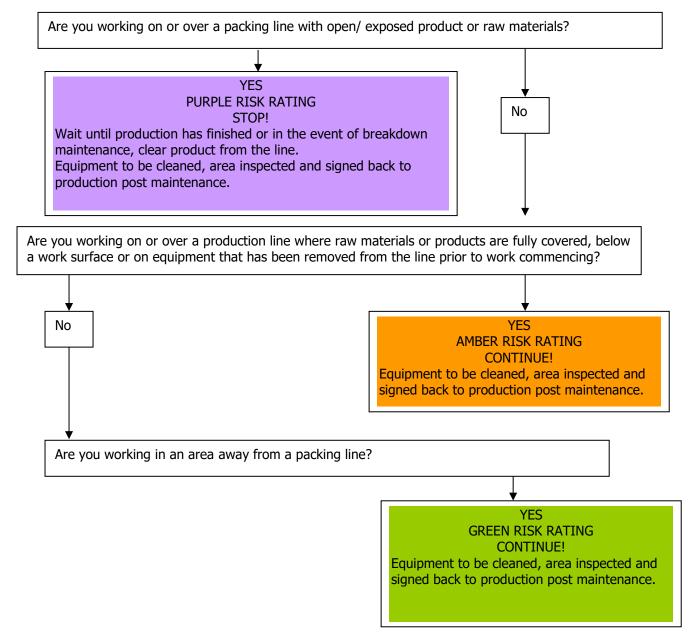
In the event of an equipment breakdown where there is a risk of product contamination by foreign bodies arising from the equipment failure, the equipment is inspected by the Managing Director / Production Manager independently of the engineering following repair to ensure the equipment and Surrounding areas are free from contaminants. The equipment is then signed back to production by the Managing Director / Production Manager.



Title: Equipment

DOC No:	PRP 8.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Risk Assessment approach is undertaken to determine this as follows:



Equipment Inspection

In addition to the planned maintenance equipment is checked daily prior to start up by the department supervisor and the Managing Director is informed of any deficiencies which are corrected before the equipment is used, these are recorded on **Maintenance Report QAS11.0**.

Temporary Repairs

If temporary repairs have to be carried out, these will be carried out without jeopardising the safety or legality of the product. Temporary repairs will be made good as soon as is practical. These are recorded on the maintenance record sheet and inspected as part of the daily pre-production checks or more frequently were risk assessment determines this.



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DOC No:	PRP 8.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Where appropriate equipment and surrounding areas are thoroughly cleaned before the re start of packing. There is a sign off sheet, which is included on **Maintenance Report QAS11.0**. All parts removed during maintenance procedures are checked and accounted for to ensure they do not in-advertently affect product quality and safety and to ensure individual machines are correctly reinstated.

Materials to be Suitable for Use

Both as part of the HACCP process and the COSHH risk assessments all lubricants and paints have been assessed as being suitable for use in the food industry to ensure no food safety risk due to contamination or tainting occurs. Their allergen status is also known. Safety Data Sheets are kept on file.

Engineering Workshop

There is no workshop on site. A dedicated tool box is kept in the process area and an inventory recorded weekly.



Title: Management of
Purchased Material

DOC No:	PRP 9.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Supplier and Raw Material Approval and Performance Monitoring

The following procedures are in place to control purchasing processes of all ingredient raw materials and packaging to ensure that any risks to the safety, authenticity, legality and quality of the final product are understood and managed.

Management of Suppliers of Raw Materials and Packaging

Supplier Approval and Performance Monitoring

There is the formal method by which suppliers are approved and monitored and information about raw materials is obtained from suppliers which is detailed below.

MATERIAL RISK CATEGORISATION

An ingredient and supplier risk assessment table has been completed to identify potential risks to product safety, authenticity, legality and quality. This assessment takes into account allergenic contamination, foreign body risks, microbiological contamination, chemical contamination, variety or species cross-contamination substitution or fraud, any risks associated with the material, legislative control or customer requirements.

The Supplier Quality Assurance programme is reviewed as part of the internal audit process annually. The frequency for re-assessing risk assessment process shall be conducted when:

- There is a change to raw material, raw material processing or supplier of the raw material
- If a new risk emerges
- Following a product recall or withdrawal, where a specific raw material is implicated.
- At least every 3 years

Assessment Procedures

Assessment of the following documentation will be used as a basis for approval of the Site's suppliers:

- 3rd Party Certification
- Supplier Questionnaire **QAS3.0**, and **3.1** The following may be used:
- Specification
- HACCP Plan
- Raw Material Analytical Results
- Supplier Review Audit.

All suppliers must provide a GFSI certificate covering the scope of the material being provided or complete and return a supplier questionnaire with a scope to include product safety, traceability, HACCP review and GMP, product security, food defence, and authenticity.

For all suppliers assessed as medium or high risk they must additionally provide evidence of a Global Food Safety certification (such as FSSC, BRC, IFS, ISO) or be Audited with a scope to include product safety, traceability, HACCP review and GMP, product security, food defence, and authenticity. The Managing Director assesses this.

On-going performance is monitored based on conformance of raw materials and services to specification, rejections and delivery service and this is documented and discussed at relevant management meetings.

Any new supplier will be approved conditionally on a 3 month trial period or the first three deliveries, whichever is the most frequent, during which time intake checks, including analytical sampling will be at an appropriate increased frequency based on an initial risk assessment commensurate with the type of material being supplied.



Title: Mana	gement of
Purchased	Material

DOC No:	PRP 9.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

A full list of Approved Suppliers is maintained manually on **Supplier Approval List**, which is copied to the buyers and materials intake staff. Purchase is therefore only allowed from suppliers on the approved list unless a concession is authorised.

Brokers and Agents

Raw material can be purchased through an approved agent. Where raw materials are purchased from agents or brokers, the identity of the last manufacturer, packer or consolidator shall be known.

Traceability

All suppliers must be able to demonstrate traceability. This can be demonstrated either by certification by GFSI standards, or directly by traceability test if the supplier is approved without certification by GFSI standards.

Where approval has been based on questionnaire instead of certification or audit, verification of the suppliers traceability system shall be carried out on first approval and then at least every 3 years.

Where the supplier is not the manufacturer, packer or consolidator of the raw material (e.g. purchased from an agent, broker or wholesaler) and approval is based on a questionnaire instead of certification or audit, the verification of the traceability system shall be carried out on the last manufacturer, packer or consolidator of the raw material.

Exception Procedure

The following **Concessions Procedure** would be activated if an exception arose. If a supplier needs to be used for commercial reasons prior to approval, then initial deliveries may occur prior to receipt of the supplier questionnaire. This may happen by completing a **Non Conformance Report** This form is circulated to all relevant personnel, who would require to be informed. In the instance of a concessions report for using an unapproved supplier this would be — Quality Manager. It would be completed by the Technical Manager. The report would detail the products, reason(s) for concession, actions required and who requested it. It would be authorised and the person or persons responsible for actioning the concession detailed. The Supplier will be added to the approved supplier list on receipt and checking of the questionnaire, specification and where relevant 3rd party certification. Failure to supply a questionnaire or failure of the material to meet specification standards will result in the supplier not being approved. Audits of the purchasing will be carried out following the internal plan; this will highlight any non-conformances. In the above situations, product testing is used to verify product quality and safety.

Raw Material and Packaging Acceptance and Monitoring Procedures

Raw Material Acceptance Checks

All raw materials and packaging are quality checked on delivery prior to acceptance this is done either by:

- Visual inspection
- o Certificates of conformance
- o Certificates of analysis
- Product sampling and testing

Results of intake checks are recorded on Intake Record.

Raw Material Acceptance Procedure

All raw materials and packaging are quality checked on delivery to **Intake Procedure**.

Management of Suppliers of Services

The suppliers of services all complete a **Supplier Self Audit Questionnaire** which is risk assessed and then added to the **Supplier Approval List** if approved.

The Site will hold on file formal contracts, agreements, specifications or specific criteria with service



Title: Management of Purchased Material

DOC No:	PRP 9.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

suppliers which define service expectations and ensure any potential food safety risks associated with the service have been addressed. Typical information is detailed in Service Supplier Criteria and RA.

All service suppliers shall be reviewed, based on risk and defined performance criteria. This is documented on the approved suppliers list.



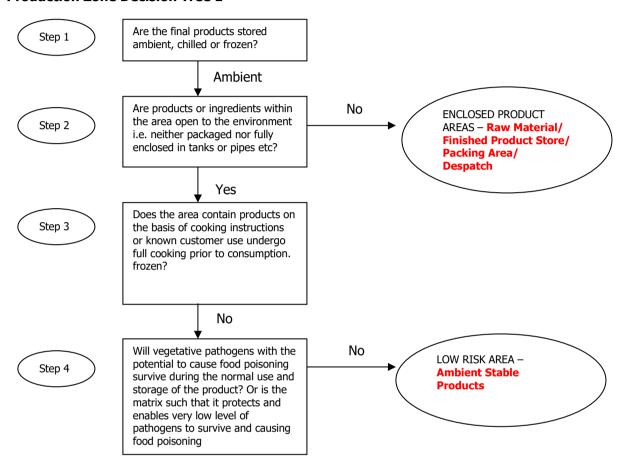
DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Microbiological Cross Contamination

Site Plan

Designated areas are highlighted in the HACCP flow chart and on site plans where product is at risk of contamination at different levels. The level of risk has been assessed using the Production Zone Decision Tree as below:

Production Zone Decision Tree 1





DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Step 1 Step 2 Step 3 Step 4

Area	Are the final products stored ambient, chilled or frozen?	Are products or ingredients within the area open to the environment (i.e. neither packaged nor fully enclosed in tanks or pipes etc.)?	Does the area contain products on the basis of cooking instructions or known customer use undergo full cooking prior to consumption?	Will vegetative pathogens with the potential to cause food poisoning survive during the normal use and storage of the product? Or is the matrix such that it protects and enables very low level of pathogens to survive and causing food poisoning	Zone Risk
		Y/N	Y/N	Y/N	
WAREHOUSE	Frozen	N	N/A	N/A	ENCLOSED PRODUCT AREAS Raw Material/ Finished Product Store/dry store
RAW MATERIAL PACKING STORE	Frozen	N	N/A	N/A	ENCLOSED PRODUCT AREAS Raw Material/ Finished Product Store/dry store
COLD STORE	Frozen	N	N/A	N/A	ENCLOSED PRODUCT AREAS Raw Material/ Finished Product Store/dry store
PRODUCTION ROOM	Frozen	Y	Y	Y	LOW RISK AREA – Ambient Stable Product
PACKING AREA	Frozen	N	N/A	N/A	ENCLOSED PRODUCT AREAS Raw Material/ Finished Product Store/dry store
DESPATCH AREA	Frozen	N	N/A	N/A	ENCLOSED PRODUCT AREAS Raw Material/ Finished Product Store/dry store



DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Category	Criteria for Risk Rating	Environmental Monitoring Requirements for Firstplay Dietary Foods
Enclosed Product	Low-	Weekly Visual cleanliness monitoring
	Visual cleanliness monitoring	
Low Risk Area	Medium –	Daily Visual Cleanliness monitoring.
	Visual cleanliness monitoring.	ATP swab of food contact areas
	ATP swabbing and Micro environmental indicator swabbing of food contact areas for TVC	Environmental micro swabs conducted every 4
	and Entros required to validate cleaning procedures.	months to completed environmental sampling
	Chillers Listeria Swabbing monitoring required.	program.
	Monitoring of hand washing advisable.	Hand Swabs tested annually months
High Care	High –	N/A
	Visual cleanliness monitoring.	
	ATP swabbing and Micro environmental swabbing of food contact areas to include TVC,	
	Entros, salmonella, and Listeria required to validate cleaning procedures.	
	Chillers Listeria Swabbing monitoring required.	
	Monitoring of hand washing / Boots swabs required.	
	Annual air assessment by displaying air plates	
Ambient High Care	High –	N/A
	Visual cleanliness monitoring.	
	ATP swabbing and Micro environmental swabbing of food contact areas to include TVC,	
	Entros, Salmonella, and Listeria required to validate cleaning procedures.	
	Chillers Listeria Swabbing monitoring required.	
	Monitoring of hand washing required.	
High Risk	High –	N/A
	Visual cleanliness monitoring.	
	ATP swabbing and Micro environmental swabbing of food contact areas to include TVC,	
	Entros, Salmonella, and Listeria required to validate cleaning procedures.	
	Quarterly Airplate for Listeria	
	Quarterly Chillers Listeria Swabbing monitoring required.	
	Monitoring of hand washing required.	

Firstplay Dietary Foods have assessed Enclosed Product and Low Risk Product Zones only.

Firstplay Dietary Foods have assessed there are no areas where there is potential for microbiological cross-contamination exists (airborne or from traffic patterns.



DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Management of Allergens

Firstplay Dietary Foods do produces allergen containing products.

Raw Material Assessment

Procedures have been developed such as reviewing product specifications to ensure that any raw materials containing allergens are handled appropriately to ensure there is no cross contamination and that final products conform to product safety, legality, quality, authenticity and customer specifications. These are detailed in a **Raw Material Risk Assessment QMS5.0**.

Risk Assessments

A Raw Material Risk Assessment QMS5.1 has been conducted for allergen containing materials held on site, including processing aids and NPD materials.

Routes of Contamination

In order to avoid cross contamination procedures have been implemented to prevent allergenic materials contamination on site. A documented risk assessment has been carried out **QMS5.0**. All raw materials are checked on intake for packaging integrity, these materials are labelled and stored separately awaiting use. Finished products are manufactured using Work Instructions and Procedures and documented using relevant **Process Sheets.**

Cross Contamination

In order to avoid cross contamination procedures have been implemented to prevent allergenic materials on site. Documented procedures have been implemented **Control and Handling of Allergens QPS5.0**. There are wheat and sulphur dioxide allergenic materials handled on site.

Rework

The Company do not use rework across different products. Rework is of the same product on the same line.

Allergen Labelling Validation

Claims are validated initially at the product development stage then via the traceability procedure. All finished products are labelled with their allergen containing raw materials.

Where a justified, risk-based assessment demonstrates that the nature of the production process is such that cross-contamination (cross-contact) from an allergen cannot be prevented, a warning is included on the label. Legislation, national guidelines or codes of practice are be used when making such a warning statement.

Allergen Claim Validation

Claims are validated initially at the product development stage then via the traceability procedure. If a claim is made regarding the suitability of a food for individuals with a food allergy or food sensitivity (sometimes referred to as a 'food hyper-sensitivity', the site shall validate and the production process to meet the stated claim and the effectiveness of the process is routinely verified. This validation shall be documented

Cleaning Equipment and Procedures

Cleaning is carried out throughout the day prior to product change-over, a full clean is carried out at the end and visually checked prior to start. An ATP swab is taken prior to start up on a random piece of equipment to validate effective cleaning.



DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

The facilities have been built to minimise the risk of physical contamination. Procedures are in place to control the risk of chemical contamination. Physical and chemical contaminants have been considered during the Risk analysis assessment and are part of the pre inspection check.

Chemical Control

All cleaning chemicals are suitable for food use, purchased from approved suppliers and have a COSHH assessment carried out as part of the Health and Safety procedures. All chemicals used in the packing and storage areas are food approved and listed on the **Supplier Approval and Vulnerability Assessment QAS3.1**, have material safety data sheets, specifications, are taint free, are clearly labelled and are safely stored in a locked designated area with their issue strictly controlled and monitored. This is documented on **Chemical Procedure QPS8.0**.

Taints

Were strongly scented chemicals are to be used these shall be used in either outside of normal working hours and will be controlled to prevent the risk of taint contamination of products.

Metal Control

The policy regarding metal including knives are controlled by the Managing Director and are issued out at the beginning of the knife shift and taken back at the end of shift. Integrity checks are carried out and recorded on the **Knife Register QAS31.0**. Any damaged or lost knives/ utensils must be fully accounted for. Damaged knives and utensils are kept in a locked container then disposed of via a registered disposal company. Snap off blade knives are not used.

Non-production blades are used by external engineers and are kept in a toolbox, all contractors are aware of the Company Rules prior to entering process areas and all must be accounted for prior to their leaving site.

Staples or other Packaging Foreign Body Hazards

Packaging and ingredients are purchased so they do not contain staples or other foreign body items that may cause product contamination or other consumer risks. Packaging Materials Risk, where it is necessary to keep documents together they are either contained within a plastic folder or a staple-less stapler is used. Staples are not used in any open product areas.

Glass, Brittle Plastic, Ceramics and Similar Materials Exclusion

The policy regarding glass or other brittle materials they are excluded were practicable but if there is no alternative they shall be protected in open product areas. There is no uncovered glass in storage and packing areas. All glass and brittle items have been listed in a breakables register and are audited monthly.

Glass Procedure

Glass and brittle materials such as plastic are listed on the breakable audit which forms part of the audit report and is audited either monthly or daily. Lights in the production facility are covered and are covered within the **Breakables Audit Register QAS12.0**. These are kept clean at all times. Cleaning or replacing light fittings are done out of normal operating hours whenever possible to ensure the product is not contaminated in any way. Where repairs are essential for personnel and/ or product safety repairs may take place during production provided that the area is cordoned off and that it is not directly above exposed product. The Staff will clean the area down in such circumstances and the Supervisor or Managing Director will inspect the area before packing recommences.

Breakage

In the event of a glass or hard plastic breakage carry out the following procedure:



DOC No:	PRP10.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

- 1. Immediately stop production.
- 2. Isolate all product in the area.
- 3. Stop personnel movement.
- 4. Quarantine an appropriate area.
- 5. All staff in the area should remain in the area and call for the Production Manager or Managing Director with the Glass Breakage Kit.
- 6. The glass breakage kit is used to clear away the area by the staff isolated in the area. In the event of no staff being isolated a member of staff will be assigned to the clean-up of the incident wearing the disposable protective clothing contained within the kit.
- 7. Clear away the breakage using the equipment contained within the glass breakage kit and dispose of all PPE from staff isolated in the area. The equipment and PPE are sealed then removed from the production area and placed into the general waste skip.
- 8. The repair is made good.
- 9. Once satisfied with the clean-up of the breakage the Production Manager or Managing Director will give the go ahead to fully clean the area disposing of any in process product.
- 10. The area is then final inspected by the Production Manager or Managing Director who then completes the maintenance report indicating when the breakage occurred, when the breakage was repaired and when the area was cleaned and approved for use.

Incident Report

Any breakages would be recorded on a non-conformance report.

Products Packed into Glass and other Brittle Containers

Storage

No Glass containers are used.

Breakage

Site has glass breakage procedure in place

Breakage Records

Breakages are recorded as a non conformance.

Wood

Exclusion

Wood is permitted in designated areas only in accordance with **Wood Procedure QPS30.0** and not used in open product areas. In addition, checks are carried out throughout the day at a frequency as detailed in HACCP pre requisite program as part of the routine process control audits.

Other Physical Contaminants

Contamination for Packaging

The site has detailed in Bag Opening Procedure QPS31.0 to prevent contamination from packaging.

Contamination from Portable Hand Held Equipment

All pens used within the production areas are fully metal detectable and are designed without small parts. Hand Held Portable Equipment has been included in **Foreign Body and Cross contamination Risk Assessment.**

Site has Foreign Body and Cross contamination risk assessment in place. Where there is a valid risk, procedures shall be implemented to minimise other types of foreign-body contamination



Title:	Sanitization	and
	Cleaning	

DOC No:	PRP11.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Housekeeping and Hygiene

Firstplay Dietary Foods always maintains appropriate standards of hygiene and good housekeeping.

Premises and Equipment

The premises and equipment are maintained in a clean and hygienic condition in accordance with documented cleaning schedules.

Cleaning Schedules

Cleaning schedules are in place for all work areas and are implemented by the hygiene cleaning team, who report to the Supervisor. Details are recorded on the **Hygiene Cleaning Checklist**. Cleaning instructions are in place and specify at a minimum:

- a) areas, items of equipment and utensils to be cleaned and/or sanitized;
- b) responsibility for the tasks specified;
- c) cleaning/sanitizing method and frequency;
- d) monitoring and verification arrangements;
- e) post-clean inspections;
- f) pre start-up inspections

Hygiene Resources

Cleaning is carried out after processing and packing has finished. Once clean, the equipment is placed ready for inspection prior to use. Operatives are trained internally by the Chemical Provider or Managing Director in the correct handling of chemicals and cleaning of the relevant equipment. **Firstplay Dietary Foods** has implemented a "clean as you go" policy for all work areas and staff are fully trained in all aspects of work area cleanliness.

Cleanliness of Equipment

The cleanliness of equipment is checked by Production Manager or trained Operative and is recorded on cleaning checklist. Results of these checks are used to identify trends in cleaning performance.

Cleaning Equipment

All chemicals used are food approved, detailed on an Approved List and COSHH details are held on file. Cleaning chemicals are either used directly from the calibrated dosing units or through a dosing unit on the pressure wash and so maintain all the manufacturer's details and instructions.

There is no CIP (Cleaning in Place) conducted.

Cleaning Performance

The effectiveness of cleaning is visually checked after cleaning by the Operative then prior to start up by the Managing Director. Any equipment or area containing gross debris is not used and is re-cleaned prior to use. A random ATP swab is taken daily prior to processing commencing to check cleaning effectiveness which is recorded on the cleaning schedule. A monthly hygiene audit is carried out by the Technical Consultant and the results discussed with the Managing Director. Environmental swabs are taken and tested via **Swab Matrix QMS6.0**.



Title: Pest Management	DOC No:	PRP12.0
	Effective Date:	01.03.25
	Revision No:	01
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Pest Management

Firstplay Dietary Foods have implemented procedures **QPS11.0** to minimise the risk of pest infestation throughout their site.

Identification of Pest Activity

The presence of any infestation on site has been identified in the pest control records and effectively controlled as part of the pest management program which is in place so that it does not present a risk to products, raw material or packaging.

Pest Control Specialist

The Company retain the services of a specialist BPCA registered pest control organisation that undertake 8 Routine Technician's Visits and 1 Biologist visits each year on a scheduled basis to ensure there is a visit carried out each month plus any treatment as appropriate. The scope of the service includes rodents, crawling insects and moths with bait boxes, insect monitors and pheromone traps being appropriately located throughout the premises. The contractor's services are clearly defined and understood and reflect Firstplay Dietary Foods site and overall business activities.

Further details of this are held in the Pest Management file with the Managing Director. Electronic Fly Killing Units and Pheromone Traps are located throughout the premises.

In-house Pest Control Not Applicable.

Documentation

The locations of all pest control measures are identified on a Site Plan. The Managing Director is responsible for managing the pest control contract.

COSHH information for the chemicals used are maintained in the pest control file.

A service report is completed by the technician following every visit which details any observed pest activity, details of pest treatments undertaken, any action required by the site or contractor and pest control products instructions used in case of an emergency. This is discussed with the site contact and signed by both parties.

Bait Stations

The bait stations are tamper proof, constructed from hard plastic and are fixed to walls to allow cleaning under. They are sited throughout the site in non-process, packing and storage areas to eliminate any potential for product contamination. If they are to be used, non-toxic rodent baits are used within internal areas except if treating an infestation. Any missing boxes are recorded and an investigation carried out to find the reason.

Electric Fly Killers

All electric fly killers are correctly sited, installed and regularly checked by the pest contactor, to ascertain their effectiveness. Fly counts are carried out and shatterproof tubes are changed at least annually or as required.

Action in the event of an infestation

All incoming raw materials are checked on arrival at the Company's premises to ensure there is no contamination, damage or pest infestation. Packaging integrity is also checked. Purchases are only made from approved suppliers and all checks are made by experienced personnel.

The Managing Director will inform the contractor immediately, who will visit the premises and take appropriate action including follow up visits until the infestation is eliminated. Any potentially affected products are subject to the non-conforming products procedure.

Analysis



Title: Pest Management	DOC No:	PRP12.0
	Effective Date:	01.03.25
	Revision No:	01
	Authorised By:	TF

Records are in hard copy format allowing for ease of trend analysis. A summary and ongoing analysis of pest activity is recorded and discussed at the monthly management meeting and reviewed at the annual management review meeting.

Understanding Signs of Pest Activity

All employees are made aware of identifying signs of pest activity **Pest Awareness QPS36.0** and the actions needed to be undertaken when these arise by reporting to the Managing Director.



Title: Personnel Hygiene and Staff Facilities

DOC No:	PRP13.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Staff Facilities

Changing Facilities

Entry to packing or storage areas is by way of appropriate changing areas. These have been designed and are operated to minimise the risk of product contamination and are sited to allow movement to and from the packing and storage areas without recourse to any external area.

Storage of Personal Items

There are personal lockers for staff to lock away personal effects and Shoe racks are provided to store shoes.

Separation of Production and Personal Clothing

The products manufactured are classed as low risk so the same coloured bakery clothing and / or disposable overalls are used for all activities. Pegs for overalls are provided for hanging during break times.

Hand Washing Facilities

Entry to the production and packing areas is via a hand washing station in the process room entrance. All hand wash facilities contain anti bactericidal soap, hand driers, hot water and the taps are hands free.

Hands must be washed on entry to the production areas. They must also be washed after picking up items off the floor, coughing, sneezing or touching the face or hair and after visiting the toilets.

Hand swabbing is carried out randomly via a **Swab Matrix QMS6.0** by Management and sent to an External Laboratory for analysis.

Toilets

Toilet facilities are outside of the processing areas and do not open directly onto the production packing or storage areas. All hand wash facilities contain anti bactericidal soap, hand sanitiser, single use paper towels, hot water and advisory signage to prompt hand washing.

Smoking

Smoking and/or the use of electronic cigarettes is only permitted in the designated area outside and all staff and visitors are made aware of the regulations.

Storage of Personal Food Items

A fridge is provided by the Company for staff to store food, no food is stored in personal lockers. This is temperature controlled and checked daily and is part of the monthly **GMP Audit**

Eating Outside

This is not encouraged, although the consumption of food in public areas outside the company boundaries is beyond the company's control.

On-Site Catering

There is a staff rest room but no food for staff consumption is prepared on site.

Protective Clothing

Wearing Protective Clothing

All food handlers, other staff and visitors working in or visiting food handling areas Wear Company issued personal protective clothing at all times. Changing procedures are displayed in the changing areas **Changing Procedures QPS10.0**.

Protective Clothing

Protective clothing covers personal clothing above the knee and ensures that product safety is not compromised. Workwear does not have buttons, outside pockets above waist level.



Title: Personnel Hygiene and Staff Facilities

DOC No:	PRP13.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Scalp Hair

All scalp hair is fully covered by a disposable hair net and hat to prevent product contamination. The same requirement also applies to all visitors and contractors.

Beards

Beards are contained by a snood and covered by a face veil. The same requirement also applies to all visitors and contractors.

Footwear

Production workers wear Company issued footwear in production, packing and storage areas. Shoe covers are provided to all visitors and contractors.

Protective clothing is removed on exiting the change areas, prior to visiting the toilet, the canteen or leaving the factory building as **Changing Procedures QPS10.0**.

Laundering

Protective bakery clothing is laundered at home. It is changed daily and pool stock are available should a more frequent change be necessary. We also carry out necessary repairs to prevent product contamination by the protective clothing, a hygiene swab is taken annually to monitor the effectiveness. Additionally, disposable PPE may be worn.

Protective Clothing Changes

Protective clothing is changed a minimum of daily.

Disposable Gloves

May be worn where required when handling specific food products but are subject to control in **Disposables Procedure QPS32.0**.

Unlaundered Personal Protective Clothing

All personal protective clothing is laundered except for captive footwear which is cleaned regularly throughout and at the end of the shift.

Medical Screening

Infection Control

Staff, including temporary staff are made aware of the importance of controlling infection by completing the following:

The **Employee Medical Questionnaire QAS25.0** must be completed by new employees. Further medical advice may be sought from a local doctor on a retained basis. Employment may be refused on the basis of this form.

Infectious Diseases

The **Return to Work Form QAS26.0** covers the reporting of infectious disease. The Fitness to Work form must be completed by food handlers on return after illness.

Management assess the completed return to work form and decide if the person should be referred to their Doctor and will only work in non-food preparation areas, where appropriate until fit to return to food handler duties.

Visitors and contractors complete a **Visitor Health Questionnaire QAS27.0**, prior to entry into production areas

Visitors and Contractors

All visitors and contractors, where appropriate, undergo medical screening by completing a **Visitor Health Questionnaire QAS27.0**, prior to entry into production areas. Any responses that give cause for concern could result in refusal to entry to areas of the factory following review.



Title: Personnel Hygiene	
and Staff Facilities	

DOC No:	PRP13.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Contact with Infectious Disease

Procedure are in place to ensure all staff, temporary staff, visitors and contractors are screened against infectious disease. Mechanisms include: The Employee Handbook, Medical Screening Questionnaire, and Visitors/ Contractors Questionnaire detail the action to be taken in the event of suffering or being in contact with infectious disease. Expert medical advice shall be sought where required.

Personal Hygiene – Raw material Handling, Preparation, Processing, Packing and Storage AreasPersonal Hygiene Rules

Firstplay Dietary Foods personal hygiene requirements are documented and are understood by all staff. Visitors and Contractor's are required to complete and sign a visitor questionnaire and sign to confirm that they have read and understand the **Hygiene Rules QPS 9.0**. This is assessed prior to access to production areas and compliance is routinely checked.

Cuts and Grazes

A Company issued waterproof, blue, detectable metal strip plaster must cover all cuts and grazes on exposed skin. In addition, where appropriate finger stalls or gloves are worn. All plasters and dressings are monitored and documented in the **QAS30.0 First Aid Issue Log**.

Plaster Testing

No Metal Detection is in use. Blues are issued and documented on QAS30.0 First Aid Issue Log.

Personal Medicines

Personal medicines are only permitted where there is need to take them during the production shift. These can be locked in the personal lockers and are taken at break times. They must not be permitted in production areas at any time and management must be made aware they are on site.

All staff receives a copy of the Hygiene Rules QPS9.0 and sign to indicate that they will comply.



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DOC No:	PRP14.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Firstplay Dietary foods ensure rework is stored, handled and used in such a way that product safety, and regulatory compliance are maintained.

Storage, identification and traceability

Stored rework shall be protected from exposure to microbiological, chemical or extraneous matter contamination.

Segregation requirements for rework (e.g. allergen) shall be documented and met.

Rework shall be clearly identified and/or labelled to allow traceability. Traceability records for rework shall be maintained.

The rework classification or the reason for rework designation shall be recorded (e.g. product name, production date, shift, line of origin, shelf-life).

Rework usage

Rework is incorporated into a product as an "in-process" step, the acceptable quantity, type and conditions of rework use is specified. The process step and method of addition, including any necessary pre-processing stages, shall be defined.

Where rework activities involve removing a product from filled or wrapped packages, controls shall be put in place to ensure the removal and segregation of packaging materials and to avoid contamination of the product with extraneous matter.

Firstplay have identified the following points of rework:

1. Drying Stage:

During the drying stage, if the moisture content is not at the desired level (less than 12%), it is possible for the product to go through the drying process again. This rework step is critical to ensure the pasta achieves the proper moisture content for quality and safety. However, this rework can only occur once. If the product still fails to reach the desired moisture level after a second drying, it must be quarantined and subsequently disposed of to prevent any quality or safety risks.

2. Sieving Stage:

This stage is crucial for detecting any foreign bodies and ensuring the product is of suitable size. The sieving process helps maintain the quality and safety of the pasta by removing any unwanted particles and ensuring uniformity.

3. Packing Stage:

In the packing stage, minor issues that do not affect the product itself and where the bag is fully sealed can be reworked. These minor issues may include slight problems with the sealing, print layout, or date spray. The rework process in this stage requires the operator to carefully open the bag by hand and return the product to the weigher for repacking. It is essential to handle the product with care to maintain its integrity. In cases where there is a major issue, such as a split bag, all affected product and packaging must be disposed of to ensure that only the highest quality products reach our customers.



Title: Management of Incidents, Recalls and Withdrawals

DOC No:	PRP 15.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Management of Incidents, Product Withdrawal and Product Recall

1. Incident/ Product Recall/ Product Withdrawal

Product Withdrawal is any measures aimed at returning of unfit product from customers but not final consumers.

Product Recall is any measures aimed at returning of unfit product from customers and final consumers.

This is to identify and recover any non-conforming product considered unsuitable for sale even products which have been released from site and carry out the appropriate action. The responsibilities and the lines of communication are detailed.

This applies to all products manufactured at Firstplay Dietary Foods will be recalled according to this procedure using the product recall/ withdrawal form, supported by any other relevant documentation.

The Managing Director or Production Manager are responsible for initiating the Product Recall/ Withdrawal Procedure when non conformities are identified. The Managing Director or the Production Manager will quantify the nature and extent of the non conformance and pass this information on to the sales team. The Managing Director will be responsible for the origination of the Product Recall/ Withdrawal Form and to ensure that all documentation is completed to ensure that the entire affected product is recovered or destroyed depending on its location. In the absence of the Managing Director, the Production Manager will assume the responsibility of the implementation of the procedure.

The Product Recall team are responsible for different areas of the recall and all can cover for each other's roles. At least two members of the team are required to complete the Product Recall/ Withdrawal. Their primary functions are briefly listed below.

From complaint information, product assessments etc, the Managing Director will assess the need to initiate a product recall/ withdrawal. All available information will be collated using the Product Recall/ Withdrawal Form. This form will include full details of the product code together with any other information relevant to product identification. The location of the affected product is identified and if on site the non conforming product procedure applied. If the product has left site then the customer will be alerted by fax or email to each customer. This will also be verbally notified. Any stock held at third party distributors are also included in the recall and where possible this is returned directly to site.

Product disposal is through an approved and licensed food waste disposal operator: Records are kept for a minimum of two years.

An incident which could result in a Product Recall or Withdrawal falls into three categories:-

1.1) Life threatening

Contamination with poisonous chemicals.

Contamination with food pathogens.

Recalls initiated by Government directives.

Terrorist Activity.

1.2) Quality failures leading to commercial liability.

Contamination with foreign bodies as a result of manufacturing faults e.g. machinery parts and personal items. Packaging defects leading to the deterioration/ contamination of products microbiological contamination of products.

Physical deterioration from specification e.g. product breaking up, colour deviation, label problems.

Issues affecting the authenticity of the products.

1.3) Malicious contamination/ risk of serious injury.

Contamination with harmful detergents or other cleaning materials.

Contamination with food pathogens likely to cause illness to susceptible groups within the general public.

Labelling discrepancies, which may adversely affect susceptible groups within the general public



Title: Management of Incidents, Recalls and Withdrawals

DOC No:	PRP 15.0
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such as allergens.

The Site also have a separate **Continuity Plan QPS7.0** which considers disruption of: Services such as water, energy, transport, refrigeration, availability of staff, communications Events such as fire, flood and natural disasters, malicious contamination or sabotage. Failure of or attacks against digital cyber security.

2. The Recall team is:

Managing Director

Initiation and final close out of documentation. Recovery of product from customers in conjunction with the Production Manager. Working with the Production Manager to ensure the physical checking of stock, receipt of returned stock, stock disposal where product is to be destroyed. Overseeing quarantine procedures and any reclassification of non-conforming product. Customer technical/ external body contact.

Production Manager

Working with the Managing Director and External Consultant to ensure the physical checking of stock, receipt of returned stock, stock disposal where product is to be destroyed. Overseeing quarantine procedures and any reclassification of non-conforming product.

Initiation and chairing. Personal responsibilities for initiating special arrangements in the event of category A and B product recalls. Customer care/ Press contact.

Recovery of product from customers in conjunction with the Technical Consultant.

Identification of affected product and its location within production stores or distribution chains. Customer credits.

Customer Notification

Procedures are in place to immediately notify any customer if they have received product that is potentially illegal or unsafe. This is by telephone in the first instance followed by a fax or email. A list of the Recall Team contact numbers and Authorities contact numbers are listed on **QMS3.0**. Customer contact details are stored on ordering system. The contacts list is linked with the manual but is regularly reviewed throughout the year and additional contacts written in but then incorporated in the annual review.



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DOC No:	PRP 15.0
Effective Date:	01.03.25
Revision No:	01
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Documented Product Recall/ Withdrawal Procedure (as detailed above).

Firstplay Dietary Foods have implemented the following documented product recall procedure:-

- 1) Determine the nature of the problem
- 2) Identify product
- 3) Identify production date and code
- 4) Check Delivery Note Details
- 5) Check quantity of similar product remaining in stock
- 6) Advise all outlets of problem/ potential problem as applicable
- 7) Withdraw/ Recall non-conforming stock from sale and collect balance from customer. As appropriate arrange product disposal or advise haulier to collect offending product for analysis or disposal.
- 3. Management if Incidents, withdrawal and recall Testing

The management of incidents, withdrawal and recall procedure is tested at least annually. If an actual recall is carried out this will count as a test. All recalls are fully documented, include timings of key events and root cause and any improvements, which are required to the system are noted and are added to the procedure. These are recorded on the **Product Recall Form** Corrective action is part of the recall procedure.

The results of the Product Recall test is discussed at the monthly management meeting and action points are discussed and implemented.

4. In the event of a significant food safety, authenticity or legality incident, including a product recall or regulatory food safety non conformity (eg. A regulatory enforcement notice, the current FSSC 22000 Certification Body will be informed within three working days. Contact details are documented on QPS7.0 Contingency Plan Firstplay Dietary Foods shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan.



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DOC No:	PRP16.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Materials and products stored in clean, dry, well-ventilated spaces protected from dust, condensation, fumes, odours or other sources of contamination

Warehousing requirements

Effective control of warehousing temperature, humidity and other environmental conditions shall be provided where required by product or storage specifications

It is recommended that where products are stacked, consideration is given to measures necessary to protect the lower layers

Waste materials and chemicals (cleaning products, lubricants, and pesticides) shall be stored separately.

A separate area or other means of segregating materials identified as non-conforming shall be provided.

Specified stock rotation systems of FIFO is observed.

Gasoline- or diesel-powered fork-lift trucks are not be used in food ingredient or product storage areas.

Vehicles, conveyances, and containers

Vehicles, conveyances, and containers are in a state of repair, cleanliness, and condition consistent with requirements given in relevant specifications.

The same vehicles, conveyances, and containers are not used for food and non-food products.

Bulk containers are not used. If required by the organization, bulk containers will be dedicated to a specified material.



Title: Product Information and Consumer Awareness

DOC No:	PRP17.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Product information and consumer awareness

Information is presented to consumers in such a way as to enable them to understand its importance and make informed choices.

Information provided by labelling and company websites and advertisements include storage, preparation and serving instructions applicable to the product.

Product Labelling

Labelling of the product follows current legislation

Labels and artwork are designed then verified by the Managing Director in conjunction with the Customer

Label Review

All labels are pre-programmed into the label printer and are authorised by the Managing Director only in conjunction with the local Trading Standards. Only nominated members of management are allowed to print Labelling information is reviewed whenever changes occur to:

- the product recipe
- raw materials
- the supplier of raw materials
- the country of origin of raw materials
- legislation.

Label Responsibility of the Customer or a Nominated Third Party

For all own label products, the company will provide all relevant information to the customer or third party to produce correct label information against the recipe and finished product specification to allow the label to be accurately generated and will gain approval from customer or nominated third party prior any ingredient changes or recipe amends or changes occur that may affect the label information. It is the responsibility of the Managing Director to ensure this process is followed.

Where cooking instructions are required to be provided for product safety, these shall be fully validated to ensure that, when cooked according to the instructions, they will consistently produce a safe, ready to eat product.



Title: Food Defence, Biovigilance and Bioterrorism

DOC No:	PRP18.0
Effective Date:	01.03.25
Revision No:	01
Authorised By:	TF

Food Defence

Security Arrangements

The company have ensured that security is maintained to prevent access of unauthorised persons to production and storage areas.

The finished product store is integral to the building and locked when not in use. Security arrangements are detailed in a **Site Security Risk Assessment QMS5.3** and are reviewed annually.

Where there is a legal requirement for specific training, this shall be in place.

Where raw materials or products are identified as being at particular risk, controls shall be introduced to manage these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering.

Controls are monitored and documented.

Controls are reviewed annually.

The site shall ensure that the food defence plan meets any legal requirements in the country of sale or intended use.

Where raw materials or products are identified as being at particular risk, the food defence plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering.

These controls shall be monitored, the results documented, and the controls reviewed at least annually.

External Storage

There is no external storage other than lairage.

Raw Material Storage, Finished Product Storage and Transport

All finished product is packed into primary packaging before being stored on site prior to despatch. Packed products awaiting sale are stored in the warehouse storage areas. In this way storage of finished product on site is visible to the Management and any breach of packaging due to tampering or sabotage will be immediately evident.

All finished products are despatched on approved transportation.

External Storage Tanks, Silos and Intake Pipes

There are none of these.

Staff Security Training

As part of the induction process and annual refresher training, staff are trained against security procedures, which also form part of the company's Health & Safety policies and procedures. As part of the procedures staff are encouraged to challenge unidentified or unknown visitors. Signs are also displayed making visitors aware.

Firstplay Dietary Foods has TACCP plan in place and has assessed the hazard to products posed by potential acts of sabotage, vandalism or terrorism and shall put in place proportional protective measures