



**Global Warehousing, Handling, Storage,
Re-packing & Transportation Quality Expectations**

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Kraft Foods

Global Warehousing, Handling, Storage, Re-packing and Transportation Quality Expectations

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Purpose: To provide Kraft Foods requirements for the systems for Quality Administration on all aspects of Warehouse, Handling, Storage and Transportation Controls required to be implemented by Warehouses and Re-packers.

Scope: all Kraft Foods businesses including contracted services

Note: *The structure of this document is based on ISO 9001:2008. Requirements Chapters 1, 2 & 3 which deal with the scope, references and definitions for the ISO Standard are not applicable in this document.*

Chapter 1 – Not applicable

Chapter 2 – Not applicable

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Chapter 4 – Quality Management System

The Operator shall establish, document, implement and maintain a quality management system as a means of assuring that Kraft Foods products or materials are handled, stored and transported in conformance with specified requirements (agreed in the contract), and continually improve its effectiveness in accordance with the requirements given in this document. This includes compliance with these requirements, Kraft Foods specifications and any applicable regulatory requirements.

The quality management system documentation shall include:

- Documented procedures for the warehousing, handling, storage, re-packing and transportation of Kraft Foods materials and products.
- Documented procedures for the Control of Documents and Records related to Kraft Foods materials and products.

Procedures and documents shall be accurate, reviewed, dated, approved by management and distribution controlled. A review shall be conducted minimum annually. Superseded documents shall be archived and readily retrievable where appropriate.

Documentation shall be up-to-date and available to staff at all locations to enable them to perform their role in the quality system.

Document and data retention for Kraft Foods materials and products shall be a minimum of shelf-life plus one year for finished products, or as per local KF business/regulatory requirements.

Chapter 5 – Management Responsibility

Top management, or the person or group of people who direct or control the organisation at the highest level, shall provide evidence of its commitment to the implementation of Kraft Foods warehousing, handling, storage, re-packing and transportation expectations. A member of site management shall have the responsibility and authority to assure that the quality management system is established, implemented and maintained.

5.1 Responsibility, Authority and Communication

The responsibility, authority and the interrelation of personnel who manage, perform and verify work affecting compliance with KF specified requirements shall be defined and documented. This information must be included in policies, procedures and job descriptions, etc.

5.2 Food Regulatory Agency Inspections and Contacts

- Each facility shall have a system in place to provide written and oral notification to Kraft Foods immediately* of any of the following which may relate to materials or products stored for Kraft Foods:
 - Visits, inspections or sample collections from external regulatory bodies
 - Regulatory actions or product hold due to regulatory sampling
 - Product holds directed by a regulatory or law enforcement body due to Food Defence related threat or suspicion, or
 - Product retrievals
- Each facility shall have designated personnel trained in the management of regulatory inspections.
- A written procedure shall be in place to describe the process for notification, follow up and closure of any issues arising from inspections or contacts.
- Kraft Foods contact name and address shall be available and current.
- A traceability report must be immediately issued for the concerned lot (quantity received in the warehouse, in stock, and shipped out by delivery point and by date) and be available for the Kraft Foods Contact.
- If any product stored for Kraft Foods is sampled by a regulatory agency, all products with the same lot code as that sample (SKU/ production period) shall be placed on hold and the Kraft Foods contracting representative contacted for instruction prior to release. Decisions on subsequent action to be taken will be made by the Kraft Foods contact and shall be documented.
- A duplicate sample of the lot of any material taken by the external regulatory bodies is required by Kraft Foods. These samples shall be stored at the facility unless requested by a Kraft Foods contract representative.
- Samples shall be labelled and stored under appropriate conditions.

*Notification to Kraft Foods ideally on the same day, at the latest the next working day.

Chapter 6 – Resource Management

6.1 Good Warehousing Practices (GWP) [ISO 6.2]

Good Warehousing, handling, storage and transportation practices shall be established to ensure that products are stored and handled under sanitary conditions.

- The Operator shall assure that all personnel, visitors and contractors follow the GWP.
- All items should be stored to avoid direct contact with the floor (e.g. on pallets, slip sheets, or racks). Sitting or standing on product shipping cases is not acceptable. Over stacking of product must be avoided.
- Products must not be stored immediately adjacent to containers for waste or non-product items (e.g. cleaning compounds).
- Soiled and dusty exteriors of cartons or other product containers shall be cleaned before they are conveyed into the warehouse or to customers.
- Broken or spilled product shall be cleaned up in a timely manner.
- Doors and gates (e.g. cargo doors) shall not be left open when not in use.
- Fork lift trucks (FLT) shall be in good repair, clean, free from leaks. FTL utilized inside a facility shall preferably be electric powered. Liquid Petroleum Gas (LPG) is acceptable. Gasoline or diesel powered FTL only allowed to be used outside facility
- FLT batteries shall be stored in a designated area in such a way as to avoid risk of material or product contamination. New technology batteries, which have a lower risk level, may require less strict segregation.
- All materials and products shall be properly identified and labelled.
- Activities which could lead to product contamination are not permitted in product handling areas. This includes eating or drinking, chewing gum or tobacco, smoking, holding objects in the mouth (e.g. toothpicks), and spitting.
- Controls shall be in place to ensure that employees wash their hands when necessary e.g. prior to returning to work from breaks or as they become soiled.
- Garbage facilities / compactors shall be adequately covered (e.g. the food source that attracts birds to warehouses is generally around the dumpster or compactor, or along the truck docks. Effective sanitation programs that eliminate these food sources must be maintained.)
- Glass and brittle materials including hard plastic components and equipment should be avoided in product areas where possible. If their use is necessary a glass and hard plastic inspection program and breakage procedure shall be in place and documented.
- Pallets must be stored in areas that are free of moisture, dirt and litter and free of bird, insect or rodent contamination.
- Pallets should not be stored outside (i.e. exterior to the building). If pallets are stored outside they must be checked before entering the warehouse.
- A pallet inspection program shall be in place to verify that pallets are suitable for use (e.g. clean, dry, free from mould, off-odours and infestation, no broken wood or loose nails)
The program shall cover:
 - New pallets
 - Incoming goods pallets
 - Shipped product pallets
 - Waste/ disposable pallets

6.2 Competence, Awareness and Training

Documented procedures shall be established and maintained for employee selection and hiring, and the training of all personnel, including temporary, consultants, or contractors, performing activities affecting compliance with KF specified requirements. Each facility must determine training needs and ensure employees receive appropriate training from qualified trainers. Employee understanding of the training shall be assessed by defined means (e.g. verbal test of understanding) to assure that training objectives are met. Records of all training shall be maintained.

Each facility shall assure that all employees handling Kraft product receive appropriate training in:

- The quality system required to meet Kraft Foods Warehousing, Handling, Storage, Re-packing and Transportation Quality Requirements, Kraft Foods specifications and regulatory requirements.
- Good Warehousing Practices (GWP) (for all employees including temporary and seasonals)
- Topics necessary to perform their function satisfactorily e.g. Forklift driving, incoming materials inspection, recording of lot numbers for traceability, etc.
- Employee illnesses and control of communicable diseases.

Induction training sessions must be organised for temporary personnel as needed (according to personnel turnover)

Refresher training shall be carried out at appropriate intervals (best practice: annually)

6.3 Infrastructure

- The facility shall be of sound construction and free from leaks.
- The internal and external structure shall be free of cracks, holes, openings, or any other areas that would allow harbourage or entry of pests. (Guidance: a gap of 10mm can allow entry of mice.)
- Supply conduits (air, water, electricity) shall be installed in such a way (e.g. under the floor) that they do not provide a cleaning/foreign matter/pest control issue.
- The structure should be free of potential sources of contamination (e.g. flaking paint, condensate from overhead pipes or structures, exhaust fans, grease, fraying insulation, undesirable moulds or dirt).
- Floors, walls, ceilings, overheads and drains shall be cleanable and constructed to resist deterioration from product or cleaning chemicals.
- All light fixtures in finished product and/or raw material storage areas shall be shielded or have plastic coated bulbs to prevent contamination in case of breakage. Where this is impractical a documented glass breakage control procedure shall be in place and followed.
- All exterior doors must be kept closed and must form an adequate seal when closed. Self-closing doors are preferred. Loading docks shall be protected to prevent pest entry. Entrance of air shall be limited by vestibules, air curtains as appropriate.
- Doors, windows and other openings shall prevent access to unauthorized people.
- Access to utilities (e.g. water supply, heating, ventilation) shall be controlled to prevent unauthorized access.
- Where wet cleaning is necessary, floors shall be adequately designed to prevent standing water. If applicable, all new floor drain installations shall be trapped and vented to prevent sewer gas entry, and must be accessible and cleanable. Existing floor drains which are not trapped and vented shall be sealed, or a plan made for their replacement.

- Hand washing and restroom facilities shall be appropriately designed and maintained.
- Grounds shall be maintained to prevent risk of pest harbourage, and be free from idle machinery and equipment, litter, debris and odour.
- The façade or installations shall not be a harbourage or nesting place for birds or other pests.
- During construction, adequate controls shall be in place to prevent contamination and ensure adequate sanitation (no dust).
- The facility must be capable of providing appropriate temperature and humidity requirements for storage or transport in order to meet Kraft Foods specifications for the products concerned. See Storage (7.6) for specific requirements details.

6.4 Maintenance Controls

A documented preventive maintenance program shall be in place to assure that the building, equipment and transportation systems do not pose a product contamination or quality risk and are suitable to meet Kraft Foods contracted conditions. This includes but is not limited to all materials handling equipment and utilities (cooling systems, air ventilation systems, trucks, containers, forklifts, hoses, alarms etc.).

6.5 Sanitation Controls]

- The facility shall have a documented sanitation/housekeeping program in place . The program shall assure the sustainable cleanliness of storage facilities, product handling areas and all transportation equipment and vehicles, as the nature of the product requires. and with consideration for peak periods
- The building (ceilings, overheads, walls and floors) and transportation equipment (containers, etc.) shall be free from dust, debris, insect webbing, mould growth, etc.
- Sanitation procedures, schedules and records of cleaning shall be documented.
- A system for verifying the effectiveness of the sanitation program of the entire facility and the transportation vehicles shall be in place.
- Precautions shall be taken for protection of products during cleaning activities.
- Cleaning chemicals, equipment and materials used shall have approved specifications. All cleaning, sanitizing and disinfecting products shall be suitable for use in a food handling environment in order to minimize odour.
- Hazardous materials or chemicals (e.g. pesticides, cleaning materials, disinfectants) shall be secured, segregated from Kraft product storage areas and access restricted to allow use by designated employees only.
- Proper tools must be utilized to prevent extraneous matter contamination of the product (e.g. separate tools for floors, drains).

6.6 Pest Control

A documented pest control program and practices shall be in place to effectively prevent pest activity in the facility and grounds.

- A complete and accurate map of installed traps, glue boards, insect-electrocutors, pheromone traps and external bait stations shall be available. Bait stations shall be of solid construction and tamper resistant. External stations shall be secured (e.g. linked to the wall by a chain, bolted to the floor using a wire retainer).

- Pest Control Inspections shall be conducted and recorded. Listed below is the appropriate frequency for inspections based on activity.

Flying insects	Min Inspection Frequency	Cleaning Frequency
Insect light traps	Monthly (Can be adjusted seasonally contact your CSC for recommended adjustments)	Monthly
Pheromone traps	Bi-weekly (Where used) (Can be adjusted seasonally contact your CSC for recommended adjustments)	Replace as needed.

RODENT TRAPS - Interior

Control Level	Definition	Approximate Spacing	Inspection Frequency
A (high)	Required for all facilities until a 12 month history is developed	25 feet / 7.5 m for process plants 50 feet / 15 m for finished product storage & shipping facilities	Weekly
B (moderate)	12 consecutive months of zero or infrequent rodent activity	50 feet / 15 m and on each side of exterior doors	Weekly
C (low)	24 consecutive months of zero or infrequent rodent activity	On sides of exterior doors only	Weekly

RODENT TRAPS - Exterior

Control Level	Definition	Approximate Spacing	Inspection Frequency
A (high)	Required for all facilities until a 12 month history is developed (see exclusions above)	50 feet / 15 m	Bi-Weekly
B (moderate)	12 consecutive months of zero or infrequent rodent activity in bait boxes	100 feet / 30m	Monthly
C (low)	24 consecutive months of zero or infrequent rodent activity	150 feet / 45m	Monthly

- Documentation of pest control checks shall include all necessary information, e.g. pest control operator, date of check, pesticide usage (type, amount of pesticide, application, lot codes, location, targeted pest and time of treatment), result of inspection and recommendations.
- If pest activity or deficiencies in the pest control program are noted, corrective actions shall be taken and controls increased appropriately. All corrective actions shall be recorded. (See table above)
- Pest activity data must be analyzed and documented to show trends in activity (e.g. insect light traps, pheromone traps and interior rodent traps)
- Manual or electronic (e.g. Rapid Trax or Pro-Track) trending of activity is required at a minimum by area. In the case where increased activity is being detected, the trending shall be completed by trap in the specific area where increased detections are being found. This increased level of trending should continue until low to no detections are again established.
- Pest management contractors must be appropriately licensed by the relevant local authority, and maintenance of that license shall be a condition of contract. Certified pest control contractors or personnel with equivalent training shall perform pest control activity.

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- Insurance requirements shall be included in the contract. A copy of the contractor's liability coverage shall be maintained and available at the facility. In cases where liability insurance is not available, the use of contracted pest management services shall be approved by the Kraft Region Director of Quality and local Kraft Law & Compliance.
- Pesticide use and application shall be strictly controlled and in accordance with the label and lot numbers shall be documented on usage records to assure traceability.
- All pesticide labels and Material Safety Data Sheets (MSDS) or equivalent material addressing safety precautions shall be available.
- It is the responsibility of the Operator to assure that any pesticide, including fumigation chemicals, used in direct contact with any packaged food product or ingredient is applied in accordance with label directions and is approved for the purpose intended.
- In general, pesticides should not be stored inside the warehouse areas. If internal pesticides storage is necessary, they shall be stored in a dedicated (only pesticides), lockable area, which is ventilated, signed and inventoried monthly .
- Residual insecticides may never be applied as a fog or aerosol.
- Rodenticides used must be in block form for use outside of the facility only. Rodenticide granulates, paste, pellets or powders are NEVER permitted.
- In the rare case that rodent activity requires use of rodenticides inside the facility, secure, tamper resistant traps or bait stations must be used and Kraft Corporate Sanitation must give approval prior to use. Rodenticides are generally not permitted inside facilities because poisoned rodents can hide and die away from the bait station. Rodents can also transport poisonous bait within the facilities.
- All ingredients, equipment, and supplies received must be inspected upon receipt for rodent excreta or any bite signs on the containers to ensure that mice do not enter the facility via incoming loads.
- All openings (walls, roof) must be screened to prevent insect or rodent ingress.
- Only approved pesticides shall be used in manufacturing and distribution facilities. A pesticide is considered approved if all of the following criteria are met.
 - Compliance with all local laws.
 - Application methods follow label instructions.
 - Suitable for use in a food manufacturing or storage warehouse (label).
 - Not categorized by the Pesticide Action Network http://www.pesticideinfo.org/Search_Products.jsp#ProdSearch (PAN) as a BAD Actor Product . The search should first be performed utilizing the pesticide's active ingredient. If there are no results the search should be done by the products trade name, or if applicable the products EPA registration number.
- In the event a pesticide being considered for use does not meet the criteria, or major pesticide application (e.g. fumigation) in the warehouse area where Kraft products are stored, it must be notified and confirmed in advance to the Kraft contact person

Chapter 7 – Product Realization (Service Provision)

7.1 Requirements Related to the Product / Service

The company shall not handle, store or transport products for Kraft Foods before a formal contract is signed by both parties.

7.2 Customer Related Processes and Communication

The Operator shall determine and implement effective arrangements for communicating with Kraft Foods in relation to:

- service information and non conforming product
- enquiries, contracts or order handling, including amendments
- customer feedback, including complaints from Kraft Foods or its customers
- any incident related to Kraft product food safety or quality (e.g. tampering, theft, trailer loss, etc.) and
- product inventory issues

In cases where the Operator receives complaints from a Kraft Foods customer, notification shall be made to Kraft Foods immediately. The customer complaint should be acknowledged, but no response given by the Operator on behalf of Kraft Foods without prior authorization.

Defined notification procedures including emergency contact lists for internal, external and consumer contacts shall be maintained.

7.3 Design and Development

The Operator shall comply with:

- Functional and performance requirements specified by Kraft Foods, including a documented plan to control potential food safety hazards (biological, chemical and physical). The plan shall follow the HACCP principles of first conducting a risk analysis, identifying appropriate controls for the risks identified, establishing control limits, monitoring and corrective action plans in the case of out of limit results.
- Applicable statutory and regulatory requirements. Storage and transportation of Kraft Foods materials and products shall conform in every respect to all relevant country legislation, and the applicable provisions of the corresponding laws and regulations of the country in which the material is used or the product sold.

7.4 Procurement

Controls shall be in place to assure that any purchased materials or services which affect Kraft Foods materials or products, or service provision, comply with the Contract (and specifications in the case of re-packers) and any applicable regulations. Examples include but may not be limited to:

- Hygiene and Pest Control services (including chemicals used)
- Warehousing, Transport and Distribution services
- Food Defence and Security
- Packaging items (shrink foil, slip sheets, pallets)

The Operator shall evaluate and select suppliers or services based on their ability to supply products or services in accordance with Kraft Foods contracted requirements. Criteria for selection, evaluation and monitoring shall be established and recorded. Any necessary actions arising from evaluation and/or monitoring, including supplier disqualification, shall be maintained.

- The Kraft Contact shall be notified prior to contracting third party outside storage or transportation of Kraft products.
- Kraft Foods Requirements shall be documented and communicated to all contracted third party warehousing and transportation providers.

7.5 Product Receipt & Shipping Controls

Documented procedures for receipt and shipping of Kraft Foods products shall be defined for all stages of the distribution process. These shall include, at a minimum:

- Incoming material and product quantities shall be recorded and verified against delivery documents.
- Controls for deliveries to warehouses including customs clearance shall be defined and in place.
- The following inspection and acceptance criteria shall be in place and documented:
 - Inbound and outbound vehicles shall be verified to be clean, dry, free from leaks, off-odours and unusual residual materials (powder or liquid) prior to loading/unloading.
 - Materials and products shall be inspected for damage, infestation, temperature abuse, potential security concerns such as perforated cases, exposure to moisture or unusual odours.
 - All full inbound and outbound truckloads shall be sealed by the responsible warehouse employees using a numbered, tamper evident, resistant seal (preferable metal). The seal shall be inspected for integrity and the number shall be verified to match the delivery documentation. In the event that it is not possible to seal a vehicle, approval by Kraft Regional Security and Corporate Quality shall be in place prior to unloading (inbound) or dispatch (outbound).
- In the event that a security seal has been broken by an authorized person (e.g. border / customs officers) there must be appropriate records to describe the reason for the seal removal. If possible, a replacement numbered seal should be applied, and details recorded on the load documents. [Note: For loads with multiple drop-off points within a one day delivery period, it is sufficient for the vehicle to be under lock control].

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- Where permissible, the credentials of delivery drivers should be verified in addition to the delivery documentation (for example, driver name shown on delivery documents, photo ID on license). If there is evidence of unsatisfactory shipping practices or tampering, then the materials must be either rejected and returned, or immediately placed on hold. A risk assessment shall be carried out by a Kraft Quality representative to determine the potential impact on the product and the Kraft contact shall be notified. (Examples: prohibited materials within the shipment, prior use of the vehicle to haul prohibited materials (placing the current shipment at risk of contamination), improper temperature control, broken, illegible, or missing seals, or seal numbers that do not match the Bill of Loading)
- Inbound and outbound bulk containers shall be sealed. Acceptable seals include:
 - Drums with a locking ring
 - Drums without a locking ring secured with tamper evident tape
 - Large bags such as super-sacks or totes containing plastic liners with a bag closure that will readily reveal any tampering and will not permit removal / reinstallation without breaking the seal
 - Corrugated cases effectively sealed and tamper-evident
- Procedures for reporting stock or delivery issues (e.g. shortages, delayed deliveries) shall be agreed with Kraft Foods contracting manager.
- Orders shall be picked, assembled and verified against Kraft Foods delivery documentation.
- Deliveries shall be palletized and wrapped according to Kraft Foods specifications.
- Loads shall be assembled to Kraft Foods / customer specifications, in such a way as to safeguard the product (e.g. heavy products at bottom).
- When possible, all openings (doors, inspection ports, hatches, etc.) on outbound shipments shall be sealed with a numbered, tamper evident, resistant seal and the seal number(s) annotated on the shipping documentation.

Requirements for transportation:

- Product quality and integrity shall be preserved during transport.
- Solid top, hard-sided, lockable or reinforced soft-sided vehicles shall be used. In regions where such equipment is not practical or available, the storage and transport conditions of the target markets shall be considered when determining suitable transport vehicles.
- Vehicles must be specified as suitable for transportation of dry foodstuffs (clean, free from odours, and have no detectable leaks).
- Use of tankers dedicated to food only- with records available for the previous product shipped, and appropriate cleaning and sanitizing (including hoses, valves & pumps), commodity transport, such as green coffee are not in the scope.
- Temperature controlled vehicles must carry suitable on board temperature monitoring devices, which alert the driver in case of failure. The haulier shall have a procedure in place to periodically verify the effective operation of temperature monitoring and temperature control devices
- Avoid storage of product directly in front of cooling equipment where this may impact product quality (e.g. Philadelphia)
- Procedures for dealing with vehicle or refrigeration systems breakdown must be in place, and include notification to Kraft Foods management.

Special Requirements for Temperature Controlled/ Conditioned, Chilled and Frozen storage/distribution (e.g. where product specifications require temperature controls):

- At a minimum, surface temperature of product (e.g. outer case) on incoming vehicles shall be checked and recorded prior to unloading.
- Risk assessment, checks and procedures need to be in place to avoid the risk of condense water on pallets / in product pack
- Trucks/Containers shall be conditioned to the specified temperature prior to loading.
- Internal temperature of the vehicle shall be checked and recorded before loading.
- Curtains or flaps shall be used where outside temperature is out of the specified range and loading areas are not controlled.
- Products shall be pre-chilled/frozen to the specified temperature prior to loading. and product shall be kept at specified temperature at all times; any interruptions shall be addressed and recorded

7.6 Storage

The condition of product in stock shall be assessed at appropriate intervals in order to detect contamination, tampering, theft or deterioration, e.g. due to pest infestation, age, unsanitary **conditions** and temperature/humidity control abuses.

- Access to storage areas, including products, packaging materials and exterior storage areas (e.g. tanks, silos) must be restricted to authorized personnel only.
- An effective FIFO (first in first out) or FEFO (first expired, first out) system shall be in place for all materials or products stored for Kraft Foods.
- Products or materials which have a strong odour shall be segregated to avoid cross contamination
- Pallets, racks and equipment shall be maintained in good condition to prevent any physical damage to materials or products (e.g. free from nails, wood splinters etc.).
- Airflow from heaters / refrigeration units shall be directed away from materials and products.
- Food, returned products, pet food and non-food items shall be handled and stored in a manner to avoid contamination (e.g. moths in dry pet food) or transfer of odours. Dividers or other precautions, e.g. traffic controls, separate air systems should be used for protection.
- If pallets are stored outside, they need to be appropriately inspected to assure that they are clean, dry and free of pests or mould.
- Racking and storage areas (e.g. staging areas, bins) must be adequately spaced from the walls (minimum 12 inches / 30 cm) to allow for inspection of areas for cleanliness, insect or rodent activity. Additionally, where rodent control devices are placed there must be an 18 inch / 45 cm gap to allow for inspection. Where this is not possible, alternative means of access must be demonstrated.
- Direct sunlight on product shall be avoided.
- Kraft Foods is responsible to specify and communicate the required product handling conditions for Warehousing, Handling, Storage, Re-packing and Transportation Where specified, monitoring of temperature and humidity must be carried out using calibrated recording equipment. This recording equipment shall be located in representative locations (worst case scenario). Additionally, a reporting system with corrective action plans for out of acceptable range results shall be defined, documented and agreed with Kraft Foods.



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Terms in common use are:

Ambient Storage

Prevailing conditions with no control over temperature or humidity required or expected.

Dry Storage

Prevailing conditions controlled to avoid absorption of humidity from air.
Temperature range +15 to +25 °C / 59 to 77 °F, relative humidity < 65%.

Conditioned Storage

Temperature controlled within a defined range of +10 to +20°C / 50 to 68 °F. Humidity max 65%

Chilled / Refrigerated Storage

Temperature controlled within a defined range of +1 to +8°C (34 to 45 °F). Humidity range not defined. Consistent with US FDA requirements.

Refrigerated (Meat - USDA)

Temperature controlled within a defined range of +1 to +4°C / 34 to 40 °F. Humidity range not defined. Consistent with USDA Food code for meat products.
Procedures in place to assure that products are pre chilled to required temperature prior to loading, and vehicles are pre chilled prior to loading for distribution.

Frozen Storage

Temperature controlled within a defined range, typically –18 to –30 C / 0 to -22 °F. Humidity range not defined. Procedures in place to assure that products are pre frozen to required temperature prior to loading and vehicles are pre frozen prior to loading for distribution.

Super Chill

Temperature controlled within a defined range of -3 to -0.5 C / 27 to 31°F. Humidity range not defined.
Procedures in place to assure that products are pre chilled to required temperature prior to loading, and vehicles are pre chilled prior to loading for distribution.

Protected

Temperature controlled within a defined range of +1 to +35C / 34 to 95°F. Humidity range not defined.

Tanker Transfer of Chocolate Masses & Fillings sold as product [e.g. to external manufacturer]

Temperature controlled within a defined range typically within 40-55 C /104-131 F. Humidity range not defined.

Where local regulations specify conditions for Warehousing, Handling, Storage, Re-packing and Transportation of products these shall also be met.

Where temperature ranges are specified for storage these shall also apply to transportation. Effective operation of vehicle chiller units shall be verified by temperature measurement

7.7 Identification and Traceability

Warehousing, Handling, Storage, Re-packing and Transportation facilities shall have a documented system for the identification and traceability of Kraft Foods products and materials in place.

- This system shall allow the Operator to trace within 4 hours the entire history of a specific lot from receipt through all stages of storage and shipping. This shall include identification of all materials handled and the customers to whom products were distributed (one step upstream – material received and handled; one step downstream – products distributed to) Time in excess of 4 hours shall be allowed in tracing the individual product components of bundled products with mixed code dates provided Kraft shall still have sufficient time to provide the full history of the products being traced within 24 hours.
- Periodic recall exercises shall be carried out to verify system capability (minimum annually).
- To facilitate this process incoming Kraft Foods products shall be identified either with the KF given code or by a lot number through which the source, date received and any special characteristics of the material can be determined.
- All shipping containers/units shall bear traceability information that is consistent with the information which appears on the consumer unit.

7.8 Control of Monitoring and Measuring Devices

The Operator shall determine the monitoring and measurement to be undertaken and devices needed to provide evidence of conformity of service to specified requirements.

- A Procedure for measuring and monitoring equipment calibration shall be documented. A calibration program of control devices e.g. thermometers, humidity controls, scales, etc. shall be in place. This shall include:
 - Master list of equipment to be calibrated, identification number, location, frequency of calibration and acceptance criteria.
 - Minimum required accuracy or allowable tolerance of the monitoring and measuring device outside of which recalibration, repair or replacement is necessary.
 - Responsibility for performing calibration
- Calibration activities shall be documented and corrective action to be taken when the results of a calibration are out of the specified limits.
- When measuring equipment is found to be out of standard, a risk assessment shall be completed to determine any product implications regarding food safety, quality or regulatory.
- Notification to Kraft Foods in cases of equipment or calibration failure.
- Calibration shall be against known and valid standards which are traceable to international or national measurement standards. Where no such standards exist, the method of establishing and maintaining the standard for calibration shall be documented.

Chapter 8 – Measurement, Analysis and Improvement

8.1 Hold & Release / Control of Non Conforming Product

- A written hold & release control program shall be in place to assure that materials and products which need to be specifically identified/isolated and held, pending determination of their final disposition, will not be inadvertently dispatched.
- Personnel shall be designated with the authority and responsibility for management of Hold and Release Programs, including monitoring and tracking held product through to final disposition.
- The Operator shall assure that product which does not conform to specified requirements is identified and controlled to prevent its unintended use or distribution, according to the Hold classifications listed below.
- A record of ALL hold events shall be maintained. Available information must include:
 - The hold category
 - Code date(s), quantity and/or time affected
 - Reason for hold
 - Investigative information
 - Final disposition and authorisation
 - Inventory verification and reconciliation
- Any materials or products suspected or identified to be non-conforming shall be placed on hold immediately upon discovery or immediately when requested by Kraft Foods Management. If the non-conformity is detected by the Operator Kraft shall be notified immediately.
- Where non-conformance is detected in products which are already in distribution the Kraft Contact shall be notified immediately. Consideration must be given to identification and segregation of remaining stock (at other storage or distribution sites) that requires documented corrective or preventive action.
- The specific reason for hold should **not** be shown on the tag or hold sticker, a reason code should be used [except where local regulations require indication of the hold reason].
- Full traceability of all non-conforming products shall be in place and inadvertent movement shall be prevented through an effective system; inventory shall be controlled.
- A systematic evaluation/audit of the hold and release program will be conducted at least annually at each site to assure the system functions properly.
- A process shall be in place to immediately notify Kraft Foods when any material or product stored for Kraft Foods, or designated for shipment to a Kraft Foods facility or to the trade is inadvertently released from hold.
- Held product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before..
- A training and awareness session will be conducted at least annually for all personnel involved with hold and release activities.

Any material or product hold must be classified into one of three 3 types of Hold:

	Category 1 Hold	Category 2 Hold	Category 3 Hold [Also called Controlled Hold]
Use for:	When a non conformity poses a potential product safety, major regulatory, or major quality concern – for example: <ul style="list-style-type: none"> ○ Undeclared Allergens identified in product ○ Failure to meet CCP requirements ○ Failure to meet specified legal requirements ○ Contamination due to employee illness ○ Unacceptable pathogen test result ○ Presence of an undeclared ingredient 	When a non conformity, or any suspected non conformity, poses a minor product quality or minor regulatory concern – for example: <ul style="list-style-type: none"> ○ A non conformance which causes the last two ingredients on the ingredient list to be in the wrong order. 	When other reasons exist for needing to hold product, unrelated to food safety or regulatory issues.
Notify Kraft	Required	Not Required	Not Required
Disposition	Designated person to manage disposition in collaboration with Kraft	Designated person will maintain communication with the appropriate facility manager and manage disposition activity	Designated person will conduct whatever communication is necessary to assure adequate control, and manage disposition activity
Identification & Segregation	Product/Material placed in a segregated and secured area and/or physically obstructed. Each unit [pallet or part pallet] of product to be visually identified. (Hold stickers or tags on pallets, chains placed across racks or bays, hold tape wrapped around cases, or placement in a caged or fenced area that is locked). Note: These controls also apply to facilities that use automated or computerised inventory management systems	Product/Material placed in a segregated area where possible. All affected product will be visually identified and/or physically obstructed. The method adopted must effectively prevent inadvertent movement. Computerised hold is sufficient for segregation if the system effectively blocks selection of the product for shipment. All affected product must still be visually identified and/or physically obstructed.	Product/Material will be visually identified and/or computer controlled. The method adopted must provide effective control. Inadvertent movement or use must be prevented.
Note: Cat. 2 & 3 Only		<i>If storage conditions preclude the use of segregated and secured Hold areas, or if visual identification or physical obstruction is not feasible due to quantity/storage constraints, then there must be a defined and effective system in place and agreed with Kraft Foods to prevent inadvertent movement or use, and to verify inventory.</i>	
Inventory Checks	Verification daily on facility operating days.	Effectiveness of facility hold system must be validated by periodic internal audit. Inventory verification minimum Monthly, or at close-out of hold event if sooner.	A defined frequency, documented in local procedures, which is adequate to assure control

- Disposition for products on hold must be approved in writing by a designated Kraft representative.
- Complete evidence/documentation of destruction (e.g. certificates), including identification of materials and products destroyed, shall be retained.
- Destruction of unsatisfactory materials and products shall be supervised to assure they cannot re-enter the distribution chain.
- Any labelled material or product that is dispositioned for destruction or animal feed must be disfigured or destroyed to assure that Kraft Trademarks cannot be reused in any manner.
- Only Kraft approved contractors or third parties shall be authorized to manage transportation and destruction of non-conforming product.
- All product dispositioned for destruction that is unfit for human or animal consumption shall be identified in the accompanying documentation.
- In the case of destruction by a third party, the contract with the third party shall specify the method of destruction, security measures, verification of destruction, final destination of the nonconforming product including company name and contact, and regulatory and environmental requirements must be met.

8.2 Returns

A procedure for handling returned materials and products shall be in place to prevent re-entry in the distribution chain.

- Drivers shall not accept returns from delivery points unless authorised in advance by the Kraft Foods contracting manager, Kraft warehouse manager, or Kraft Customer Service. (Returns do not include deliveries or part deliveries which are not accepted by the customer).
- Kraft Foods management must be notified of all returns. Returns must be clearly identified, segregated from regular materials or products, and placed on hold until inspected and dispositioned by Kraft Foods authorized personnel.
- Returned product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before.

8.3 Internal Audit & External Audits

- An internal audit program shall be established, documented and maintained to verify the effectiveness of the quality system.
- Where the Operator has a quality management system which is registered under the ISO QMS standard, all requirements for internal audit given in the standard shall be met. Where the Operator does not have a quality management system which is registered, sufficient internal verification activity shall be carried out to assure that Kraft Foods requirements are met (minimum review each two years).
- All facilities shall have effective programs for managing audits conducted by third parties in areas where Kraft products are managed. This shall include but is not limited to:
 - Appropriate controls to restrict disclosure of confidential and/or proprietary Kraft information, products and processes.
 - Follow up and closure of any non-conformances.
- Notification to Kraft Foods of any serious issues raised during the audit. Corrective actions identified during both internal and external (e.g. third party) audits shall form part of the audit report and responsibility for tracking corrective actions to close-out shall be identified

.8.4 Kraft Foods Quality Auditor Access

- Kraft Foods quality auditors shall be authorised to enter and audit/inspect at reasonable times any establishment storing, shipping or handling Kraft Foods products.
- The audit/inspection may include review of records, processes, controls and facilities that demonstrate that storage of products for Kraft Foods are in line with requirements and specifications.
- Limitations: An audit/inspection shall not extend to financial data, sales data (other than that directly related to Kraft Foods), pricing data or personnel data (other than data regarding qualifications of technical and professional personnel performing functions pertinent to the audit).
- Notification of Audits: It is Kraft Foods policy to give advance notice of intent to conduct an audit/inspection. However, nothing in any contract shall deny the right of Kraft Foods to conduct unannounced audits by its own agents, or through firms/agencies that conduct audits under contract.
- Kraft Foods auditors shall not be exposed to confidential technology, which could compromise Kraft Foods business at a later date. Kraft auditors must be informed prior to the scheduled audit in this instance, as it is Kraft Foods policy not to sign confidentiality agreements with suppliers/ Warehouses/ Re-packers prior to or at the time of a quality audit.

8.5 Corrective and Preventive Action

Corrective action shall take place (but is not limited to) when:

- A non-conformity relating to product or product handling caused by the Operator led to a hold (e.g. interruption of cooling chain)
- Quality system failures lead to non-compliance with Kraft Foods Warehouse, Handling, Storage, Re-packing and Transportation Quality Requirements or regulatory requirements.
- Regulatory authorities identify conditions that may violate laws or regulations. The Kraft Foods contracting representative shall be notified of violations which directly or indirectly impact products stored for Kraft Foods and the actions taken to correct the violation and prevent reoccurrence.

In such cases, a root cause analysis shall be conducted, documented and actions taken to prevent recurrence. Corrective Actions shall be tracked, monitored and closed out.

Confidentiality

- All sites shall establish systematic procedures for the management of confidentiality when working with outside parties. Confidentiality may be required by either party to prevent the unintentional disclosure of customer confidential information or disclosure of Kraft Foods confidential information.
- Where confidentiality is required by Kraft, it will be specified in the contract. If any pre-existing confidentiality agreement is in place this shall be reviewed to assure that the new information being exchanged is covered by the terms of the agreement. Procedures shall be in place to assure the adequate documentation of confidentiality is completed prior to the exchange of information.
- Any information, which is already in the public domain, cannot be subject to Confidentiality.

Appendix 1 – Further Requirements for Re-packers

Specifications

- The company shall assure that authorised Kraft Foods instructions and /or specifications (reviewed and signed by authorised Kraft Foods representative) are in place at the production location.
- The company shall have policies and procedures in place to assure products meet all Kraft Foods specifications.
- All specification changes must be approved by Kraft.

Materials receipt

- Conformance to specification shall be verified for all applicable incoming materials.
- Any damaged or non-conforming stock shall be held and Kraft Foods notified.

Training

- For sites that manage allergen labelling as a control point, employees must receive annual Allergen training related to the program including monitoring, documentation, verification, and corrective actions if the controls are not met.

Sanitation and Equipment Design:

- Dedicated tools and equipment shall be used for sanitation and managed to avoid contamination of product and packaging materials.
- Equipment surfaces shall be made of suitable materials to avoid damage to product and primary packaging quality (e.g. easy to clean, smooth and in good condition).

Packaging and Label Control

The company shall have controls in place to assure proper labelling of products supplied to Kraft Foods.

- Packaging materials shall be purchased according to documented, Kraft approved specifications.
- All labels shall be reviewed and approved by Kraft before use.
- Packaging and labels shall be verified against the Kraft Foods approved version prior to use.
- No changes shall be made to labels without prior authorisation from Kraft Foods.
- Kraft Foods Packaging shall only be used for Kraft Foods products.
- Controls must be in place to assure that correct finished product labels are applied to products (e.g. periodic label verifications, copies of labels saved with production records, a full review of control documents at the end of shift, documented label inventory control procedures). Where packages are similar, but allergen profiles are different, a risk assessment shall be carried out to determine whether additional control measures, such as bar code readers to link the label to the corresponding product must be implemented.
- For the following scenarios, application of correct labels shall be verified:
 - Where labels for different varieties have similar appearance
 - Where products with dissimilar allergen profiles are packaged into a new consumer unit and re-labelled



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- Destruction of obsolete or defective Kraft Foods labels or packaging materials containing the Kraft Foods identification must have prior approval from the Kraft contract representative. Labels, cartons or caps that will not be used, or are obsolete must be destroyed to prevent unauthorized use. Any labelled finished product which is discarded must also be disfigured or destroyed so that the container, label or cap cannot be re-used.

Process Control

- Appropriate production personnel shall have access to the latest specifications and/or work instructions for re-packing products supplied to or manufactured for Kraft Foods.
- A process for routine inspection to ensure conformance to specifications during production for Kraft Foods shall be established, documented and implemented.

Net Contents Control

- Packages that declare a piece count shall be correct for each package.
- Net content in an established compliance lot must, on average, equal or exceed the declared label quantities at the point of manufacture
- Individual packages shall be controlled to avoid underweights as defined by local regulations.
- Where net weights are determined indirectly, tare weight determination and monitoring must be specified in the site net content plan.

Traceability and Shelf Life

- All finished product consumer packages will bear information applied to the package that allows effective product traceability to product date and location. This shall include at a minimum: site identifier (see below), **Open date**, and shift (if applicable). Where products are produced on more than one line in a facility the line designation shall also be added.
- A recall code including a site identifier, which is assigned by Kraft, shall be used for traceability of a product's manufacturing origin and is required to be applied to:
 - Each pallet
 - Each site generated Stock Keeping Unit (SKU)
 - Each site generated Consumer Unit
- Packages that are reconfigured (combined or consolidated) into new consumer sale units shall have traceability maintained for all components. For example, when several packaged products are combined or wrapped together to make up a variety pack the site shall log the production dates of the individual packages going into the variety pack on a particular line, day, and shift).
- Where packaging or labels that contain consumer information (e.g. allergen statements, nutrition, etc.) are applied to a reconfigured customer unit, the traceability of these materials shall also be maintained.
- For packages that contain more than one component (e.g. variety packs, sauce pouches, spice packets, etc.) or mixed code dates, the shelf life indication data of the finished package shall be the same as the component with the earliest expiration date (e.g. shortest shelf life indication).
- Packages that contain multiple smaller packages designed to be sold individually or as a single unit shall have the shelf life information marked on both the multi-pack and the individual components contained within.

Supplier Quality Management

- Quality requirements and specifications in accordance with KF Quality requirements shall be documented and address the programs and controls which suppliers must have in place to assure the safety, quality and regulatory compliance of purchased goods that will be used for Kraft products.
- A procedure shall be in place to approve suppliers, including a process for qualification, evaluation, approval, and maintenance.

HACCP

- Repacking facilities must assess and document the assessment for each new product to determine if the process introduces any additional food safety risks. Most of these risks can be controlled through good prerequisite programs. However, the following cases are examples of controls that must be carefully considered and may be managed as Control Points:
 - Repacking of products with dissimilar allergen profiles that require a new label
 - Product handling outside its specified temperature and humidity requirements
 - Handling of breakable items (e.g. ceramic mugs, glass jars, etc.)

Additional Communication with Kraft Foods:

- The company shall have a system in place to notify in writing the Kraft Foods contracting representative prior to any changes in packaging, production facility or processes that may impact the quality, labelling or functionality of a finished product.

Appendix 2 – Definitions

- **Re-Packer:** Supplier who receives packed finished products and reconfigures them into a new trade unit of sale. There is no direct handling of open/exposed product. Note: In certain KIC functions this can be referred to as a “Co-Packer”.
- **Contract Packer (Co-Packer):** Supplier who conducts the primary packaging operation for KF branded finished products; they receive a “consumer-ready” work in process (WIP) and perform no additional processing but conduct the final open/exposed product operation. Supplier who receives semi-finished products and reconfigures them into a trade unit of sale, KF branded. Co-packers are held to the requirements set forth in the External Manufacturing Quality Standards.
- **Disposition:** Determining and authorizing what must be done with product, ingredient or packaging which has been placed on hold. Examples would include:
 - Accept – may be sold through normal channels
 - May be further processed by Rework, repair or reclaim to meet specifications
 - May be accepted, with or without further processing, for alternative applications (Re-graded, for example to liquidation or distressed sales)
 - Reject or scrap. Destruction of products and packaging shall be carried out in a secure manner to prevent recovery or re-use.
- **Extraneous Matter:** Any object or matter which may become part of the product being produced, which is not designed to be part of such product. Extraneous matter may be a foreign object, foreign material or an aberration in the product or product ingredient. Examples may include: metal; stones; wood; animal parts; plastic; paper and extraneous matter inherent to raw materials (bone, nut shells, etc.)
- **Food Defence:** Safeguarding the food supply against intentional acts (or threat of an act), such as mass contamination and product tampering. Food Defence should not be confused with Food Security which, as defined by the World Health Organisation (WHO), includes concerns about the availability of a sufficient national food supply.
- **Government Regulations:** The laws and regulations of the location in which products are stored and the laws and regulations of the destination to which products may be shipped.
- **HACCP (Hazard Analysis and Critical Control Points):** A system identifying specific hazard(s) and preventative measures for their control.
- **Hazard:** The potential to cause harm. Hazards can be biological, chemical or physical.
- **Hold:** A status assigned to specified product indicating it must all remain stopped from normal handling processes until further notice. Synonyms include: quarantined, blocked, segregated, contained, embargoed, etc.
- **Lot:** A unique identity given to a defined quantity of a material usually based on time and location of manufacture. For continuous processes, a lot cannot exceed the amount of material produced in one 24 hour period. For non-continuous processes, the batch, blend, shift, or other time segment may be used to identify a lot. For materials received in bulk, the lot would usually be identified as the contents of the bulk vehicle.
- **Non-Conforming:** Non fulfilment of a need or expectation that is stated, generally implied, or obligatory
- **Operator:** Any Kraft Foods department/third party company providing a service (e.g. storage, transport) involving the handling of Kraft Foods products/raw materials.
- **Packaging Component:** All elements of packaging including adhesives, labels, inks, dyes and stabilizers.

- **Pathogen**: A food borne micro organism recognized as a public health hazard that can cause illness or death in humans.
- **Pesticides**: Compounds classified as such by the regulatory authorities of the location where stored and the destination to which products may be delivered. These include, but are not limited to, fungicides, insecticides, rodenticides and herbicides.
- **Product Retrieval**: Any voluntary or involuntary retrieval of product that has been released for distribution.
- **Product returns**: Within Kraft Foods Control: Third party warehouses directly contracted to Kraft Foods, including the warehouses of re-packers, and with systems approved by KF audit are considered to be within Kraft foods control. Outside Kraft Foods Control: Product returned from trade or customer's own warehouses, distributors or stores
- **Purchased Materials**: equipment, services or materials purchased for use in the Kraft Foods operations.
- **Quality Program**: A logical sequence of actions designed to assure specific product quality specifications are met.
- **Quality Records**: Documents detailing the history of a lot of finished product, distribution steps, control charts, inspection results, amount stored, formal releases and disposition.
- **Quality System**: Organisational structure, policies, programs and procedures needed to manage product quality.
- **Regulatory Action**: A seizure, embargo, hold of any product or a prosecution, injunction, citation, regulatory letter or notice of adverse findings from a regulatory authority or any federal, state, provincial or local court.
- **Regulatory Authority**: Any duly authorised agent or employee of any government agency empowered to enforce laws relative to food products. Any religious organisation which defines requirements for special product certification (i.e. Kosher).
- **Regulatory Contact**: A visit, inspection, audit, survey, inquiry or other contact by any regulatory authority that results in the identification of objectionable conditions which require a response. This does not include those visits made on a regular basis (i.e. daily, weekly, monthly), unless such a visit reveals a material or product destined for a Kraft Foods facility is not in compliance with applicable laws or regulations.
- **Risk**: An estimate of the likely occurrence of a hazard or illness.
- **Special Situation**: A Special Situation includes any product, facility issue or set of circumstances that has the likely potential, to expose:
 - Consumers, employees or other individuals or entities or the environment to injury, loss, harm or damage, or
 - The company, its employees, products, tangible or intangible assets to serious legal or regulatory liability, severe adverse publicity, sustainable negative public opinion or damage to the reputation of the company, or
 - Kraft business Operations to severe disruption.
- **Suitable Facility**: A facility in which the design, layout and utilities meet all Good Warehousing/ Distribution Practices (GWP), industry standards and present no food safety or other risk to Kraft Foods.
- **Traceability**: The ability to track a specific lot of ingredient/component to the product which contains it; and to track a finished product to the primary external customer(s) or destination(s).
- **Tankers**: closed bulk haulage

Appendix 3 – Food Defence and Supply Chain Security

Warehouses and Repackers acting on behalf of Kraft Foods which pack, or in any way handle ingredients or final product will develop specific procedures to secure our product, to deter and prevent intentional contamination and will have protocols in place to quickly and accurately identify, respond to and contain threats or acts of intentional contamination. Likewise, warehouses and repackers will ensure their suppliers adopt similar protocols and implement appropriate controls. At Kraft Foods we call these efforts Food Defence and we depend on our warehouses and repackers to do their part in helping us secure our combined portion of the world's food chain.

The laws and government expectations regarding Food Defence vary from country to country. Food manufacturers and handlers that operate in the United States or that ship into the United States have the most stringent requirements in the world. Elsewhere laws are less prescriptive. Kraft Foods has defined a minimum set of Food Defence standards to help us meet legal and consumer expectations. The standards may exceed the requirements of a specific country or area.

Additional information, related regulations and training are described in ***Appendix 4: Food Defence***.

(1) **US-based warehouses/repackers and international warehouses/repackers shipping direct materials or finished product into the United States or Canada** on behalf of Kraft Foods are expected to complete the below requirements and be prepared to provide Kraft Foods confirmation that they have completed these requirements.

1. Adopt and maintain a facility Food Defence program (outlined below).
2. FDA facility registration list. Complete and maintain registration in the Kraft Foods FDA facility registration list.
3. One-Up-One-Down records maintenance. Maintain records to identify the immediate previous source of food or ingredient received and the immediate subsequent recipient of food or ingredient shipped.
4. Detained product. Ensure detained product is held as directed by Kraft Foods (See Chapter 8 – Measurement, Analysis and Improvement).
5. Meet C-TPAT Minimum Security Criteria for Foreign Manufacturers if making shipments to the U.S. or Canada but originating elsewhere. See: http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/sec_criteria_foreign_mfc/foreign_mfc_security_criteria.xml
6. Container Security. When transporting a container or trailer for a C-TPAT importer, a high security seal that meets or exceeds the current PAS ISO 17712 standards for high security seals must be utilized.

(2) **Kraft Foods international warehouses/repackers which do not ship into the United States** are expected to develop facility Food Defence programs that meet at minimum set standards (outlined below) and be prepared to provide Kraft Foods confirmation they have met these requirements.

Kraft has a responsibility to governments and consumers to secure our Services and operations from the threats of intentional contamination of the food supply chain. These responsibilities need to be embraced by our key partners, distribution and transportation service providers, Carriers, etc. and are reflected within this document. In addition, the voluntary Customs-Trade Partnership against Terrorism (CT-PAT) and Technology Asset Protection Association (TAPA) program is designed to promote supply chain security and includes specific criteria for different types of activities.

Kraft intention is that above described site-specific controls are in place to protect materials from incidents or threats of intentional contamination. Carrier shall work on solutions in order to implement these guidelines in long term.

(3) A Food Defence Program shall include the following:

1. Program Administration

- (a) A documented plan that explains the site's Food Defense procedures and strategies.
- (b) Clearly-defined roles and responsibilities of those individuals responsible for maintaining the program.
- (c) Procedures for reporting threats or acts of intentional contamination to Kraft Foods and others (as required by local law).
- (d) Annual vulnerability self-assessments and procedures for fixing gaps.

2. Access control. An access control system will deter people with the intent of harming our products from gaining access to do so. Warehouses/Repackers must implement systems and procedures to identify people who are regularly on site (e.g., employees and contractors) as well as to limit access to restricted areas to authorized people only. Specifically:

- (a) Processing and manufacturing areas
- (b) Ingredient and raw material storage areas (to include packaging stocks)
- (c) Hazardous and chemical storage areas
- (d) Shipping and receiving areas

3. Background Screening. Warehouses/Repackers will conduct background screening checks on employee candidates. Local law will dictate what kind of background checks can be conducted. In the US, criminal checks, reference and qualification checks and drug screening are routine and is typically addressed in contract language.

4. Shipping and Receiving. The warehouse/repacker shall take deliberate steps, and implement procedures to monitor and verify the integrity of incoming and outgoing shipments. This includes the requirements described in Sections 7.5 (Product Receipt and Shipping Controls) and 7.6 (Storage).



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APPENDIX 4: FOOD DEFENCE

Warehouses and Repackers should contact their Kraft Foods contact to obtain samples of our Food Defence support materials such as a Food Defence Plan Guideline, site assessment tools, and training materials.

Warehouses and Repackers are also encouraged to use the numerous public and government websites (a sampling is provided below) to assist with their Food Defence program development.

C-TPAT

Please note that shipments from outside the U.S. or Canada must meet the C-TPAT Import Security Criteria, please click on the link for specific information:

(http://www.customs.ustreas.gov/xp/cgov/import/commercial_enforcement/ctpat/criteria_importers/ctpat_importer_criteria.xml)

C-TPAT members: http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/ctpat_members/

C-TPAT Cargo Security http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/

C-TPAT Foreign Manufacturers:

http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/sec_criteria_foreign_mfc/foreign_mfc_security_criteria.xml

FOOD & DRUG ADMINISTRATION (FDA):

Federal Food, Drug, and Cosmetic Act, 21 USC 321, et. seq.

<http://www.fda.gov/RegulatoryInformation/Legislation/FederalFoodDrugandCosmeticActFDCAAct/default.htm>

FDA Guidelines, <http://www.fda.gov/ForIndustry/GuidanceDocuments/default.htm>

Reportable Food Registry Section 417 of the FDCA.

<http://www.fda.gov/RegulatoryInformation/Legislation/FederalFoodDrugandCosmeticActFDCAAct/FDCAActChapterIVFood/ucm088549.htm>

21 CFR 1-199, <http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200821>

42 CFR 73, http://www.selectagents.gov/resources/42_cfr_73_final_rule.pdf

FDA - "ALERT: Food Defence Awareness"

<http://www.accessdata.fda.gov/videos/CFSAN/ALERT/alrt01.cfm>

UNITED STATES DEPARTMENT of AGRICULTURE (USDA) & FOOD SERVICE INSPECTION SERVICES (FSIS)

USDA - Food Safety and Inspection Service (FSIS) "Developing a **Food Defense** Plan for Meat and Poultry Slaughter and Processing Plants", January

2007 http://www.fsis.usda.gov/PDF/Food_Defence_Plan.pdf

FDA/USDA - "An Introduction to **Food Security** Awareness"

<http://www.fda.gov/ora/training/orau/FoodSecurity/startpage.html>

DEPARTMENT OF HOMELAND SECURITY (DHS)

CBP – Customs-Trade Partnership Against Terrorism Security Criteria

http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/