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CERTIFICATE OF REGISTRATION

Intertek Certification Ltd (UKAS 014) certifies that, having conducted an audit **for the Scope of Activities:** Processing (peeling, sizing, soaking, bread coating, cooking, freezing) of frozen raw and cooked shrimp packed in plastic bags/trays with or without vacuum.

Exclusions from Scope: None

Product Categories: 8 - Cooked meat / fish products
4 - Raw fish products and preparations

at

CUULONG SEAPRODUCTS COMPANY (CUULONG SEAPRO)

BRCGS Site Code: 2030803

Site Address: 36 Bach Dang Street, Ward 4, Tra Vinh City, Tra Vinh Province, Vietnam

has achieved Grade: B+

has been assessed by Intertek as conforming to the requirements of:

GLOBAL STANDARD for FOOD SAFETY ISSUE 9: AUGUST 2022

Audit Programme: Unannounced

Auditor Number:
21972

Certificate Number:
0113422

Dates of Audit:
10-12 Mar 2025

Certificate Issue Date:
20 Apr 2025

Re-audit Due Date:
(An.): 20 May 2026 to 17 Jun 2026
(Unan.): 17 Feb 2026 to 17 Jun 2026

Certificate Expiry Date:
29 Jul 2026

BRCGS CERTIFICATION™ intertek
UKAS PRODUCT CERTIFICATION 014
BRCGS Food Safety CERTIFICATED

Rathin Grover
President Business Assurance

Intertek Certification Limited, 10A Victory Park, Victory Road, Derby DE24 8ZF, United Kingdom

Intertek Certification Limited is a UKAS accredited body under schedule of accreditation no. 014.

Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	CUULONG SEAPRODUCTS COMPANY (CUULONG SEAPRO)	Site code	2030803
Site name	CUULONG SEAPRODUCTS COMPANY (CUULONG SEAPRO)		
Scope of audit	Processing (peeling, sizing, soaking, bread coating, cooking, freezing) of frozen raw and cooked shrimp packed in plastic bags/trays with or without vacuum.		
Exclusions from scope	None		
Justification for exclusion	None		
Audit start date	3/10/2025	Audit finish date	3/12/2025
Re-audit due date	6/17/2026	Head office	No

Additional modules included			
Modules	Result	Scope	Exclusions from Scope

2. Audit Results					
Audit result	Certificated	Audit grade	B+	Audit programme	Unannounced - Voluntary
Previous audit grade	B+		Previous audit date	3/16/2024	
Certificate issue date	4/20/2025		Certificate expiry date	7/29/2026	
Number of non-conformities			Fundamental	0	

2. Audit Results

	Critical	0
	Major	0
	Minor	12

3. Company Details

Site address	36 Bach Dang Street Ward 4 Tra Vinh City Tra Vinh Province		
Country	VIET NAM	Site telephone number	+ 842943852052
Commercial representative name	Truong Thanh Tan – General Director	Email	chi.nguyen@cuulongseapro.vn
Technical representative name	Nguyen Thi Phuong Chi – QA Manager	Email	chi.nguyen@cuulongseapro.vn

4. Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift pattern	1				
Seasonal site	No				

4. Company Profile		
Seasonal opening times (Start/end date)		
Other certificates held	IFS, BAP, BSCI, ISO17025 Vilas365 and ASC.	
Outsourced processes	No	
Outsourced process description	None	
Regions exported to	Asia North America Europe	
Company registration number	Business license: 2100307704 FDA registration number: 19184142766 DL31 (raw and cooked), DL326 (raw)	
Major changes since last BRCGS audit	No major change from the last audit	

Company Description

CUULONG SEAPRODUCTS COMPANY (CUULONG SEAPRO) was established in the year 2005 in Tra Vinh City, Tra Vinh Province with Tra Vinh City, Tra Vinh Province.

- Factory area: 12000m2.

- Total employees: 450 working a 1 shift system for full time and no part-time employees. 6 days per week.

- No seasonal production. No external worker; no outsourced production, No sub-company, no seasonal break. The subcontract is the laboratory.

- Main products: Frozen raw and cooked shrimp.

- Main market: EU, USA, Asia.

- Production capacity: 330 MT products/month.

4. Company Profile

- Main equipment: 02 size grading machines (400kg/machine); 05 vacuum machines; 06 Flake ice makers (50MT/24h); 02 cooker (700kg/h); 05 IQF freezers (500kg/h/machine); 01 block freezers (1000 kg/h/machine); 06 metal detectors; Cold storages with volume 4900MT.

- Certificates awarded: The site has been awarded: BRCGS, IFS, BAP, BSCI, ISO17025 Vilas365 and ASC.

- The site has been approved HACCP system and granted the EU Code - DL31 (raw and cooked) and DL326 (raw) for exporting to EU markets by the National Agro-Forestry-Fisheries Quality Assurance Department

- Contact person: Nguyen Thi Phuong Chi – QA Manager (chi.nguyen@cuulongseapro.vn) was in charge.

- The company fulfills the requirement about the use of the BRCGS logo.

5. Product Characteristics

Product categories	08 - Cooked meat/fish products 04 - Raw fish products & preparations
Finished product safety rationale	Ready to cook was defined for frozen raw product, ready to eat product cooked at 100oC, core temperature 72oC in 1 minute, all frozen product was storage at -18oC

High care	No	High risk	Yes	Ambient high care	No

Justification for area	The frozen ready to eat product present at this site. High-risk product area was defined from cooling step to packing of frozen cooked product. Enclose product area was defined after packing
Allergens handled on site	Crustaceans Cereals containing gluten Mustard
Product claims made e.g. IP, organic	BAP, ASC

5. Product Characteristics	
Product recalls in last 12 months	No
Products in production at the time of the audit	Frozen cooked shrimp with sauce, frozen raw shrimp

6. Audit Duration Details			
Total audit duration	26	Duration of production facility inspection	13
Reasons for deviation from typical or expected audit duration	None		
Combined audits	None		
Next audit type selected	Unannounced - Voluntary		

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
Nguyen Van Thien	Deputy General Director	X			X
Pham Song Ho	Deputy General Director	X	X		X
Thai Quoc Thinh	Factory Director	X	X	X	X
Le Thuy Trang	Technical	X	X	X	X

Nguyen Ngoc Tham	Technical	X		X	X
Tran Van Miet Hai	QC Manager	X	X	X	X
Doan Thi My Tien	Technical	X	X	X	X
Nguyen Thuy Thuy Duong	Technical	X		X	X
Cao Cui Nhung	Technical	X	X	X	X
Ma Thanh Thoang Em	Metal detector		X		
Thach Thi Kim Kieu	Receiving		X		
Pham Van Can	Cooking		X		
Ho Thanh Tuan	Packing		X		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail

Document control

Certification Body			
Intertek Certification Limited			
10 A Victory Park			
UNITED KINGDOM			
CB Report number	0113422		
Template Name	F908 Food Safety Audit Report Template		
Standard Issue	9	*Template issue date*	12/16/2022
Directory allocation		*Version*	

Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.2	No evidence of evaluation of the effectiveness of the food safety and quality culture plan implemented in 2024.	QA and HACCP team to perform a documented review of the 2024 culture plan effectiveness.	Develop and implement a review template and procedure for the culture plan	The company lacks a structured review process and performance metrics to evaluate culture activities. The procedures for the culture plan do not require or guide how to measure and document effectiveness, and responsibilities for review are not clearly assigned.	4/9/2025	Nguyen Tuan
2.6.1	The HACCP team performed an on-site validation of the production process, but there was no documented verification or cross-check against the process flow diagram.	The HACCP team will conduct a documented cross-check between the actual process and the flow diagram.	Revise the HACCP verification checklist to include a mandatory section for flow diagram review and confirmation.	The current form used for validation does not include fields to reference or update the flow diagram, nor is there a responsible person assigned to this specific task.	4/9/2025	Nguyen Tuan

Minor						
3.5.1.1	The risk assessment for raw materials did not include evaluation of the risk of species cross-contamination.	QA and Procurement teams to immediately review and update raw material risk assessments to include species cross-contamination.	Revise the risk assessment template to include a dedicated section for Species identity verification.	The raw material risk assessment template lacks a defined category or prompt for evaluating species identity or substitution risks.	4/9/2025	Nguyen Tuan
4.4.4	In the preprocessing zone, several small holes were observed on plastic ceiling panels. Although the holes were not located directly above open product zones.	The maintenance and repair team will inspect and immediately seal or replace damaged ceiling panels.	Add ceiling and overhead structures to the monthly GMP inspection checklist, with photographic records and risk-based prioritization.	The current facility inspection procedures do not include overhead surfaces such as ceiling panels.	4/9/2025	Nguyen Tuan
4.4.8	An external access door to the processing building does not have any insect control barrier to prevent flying insect ingress when opened.	The maintenance team will install an plastic curtain at the affected external door to block flying insects.	Include routine inspection of pest control infrastructure in the monthly facility hygiene audit.	The infrastructure design and layout planning did not include pest exclusion as a design criterion for all external openings.	4/9/2025	Nguyen Tuan
4.6.6	Several hand trolleys in the preprocessing area were observed to have visible signs of rust and peeling paint	The maintenance team will clean and repair hand trolleys depending on severity.	Update the preventive maintenance plan to include transportation. Integrate a visual equipment inspection checklist in monthly GMP	There is no defined inspection or preventive maintenance program for transport equipment such as hand pallet trucks. These items are not	4/9/2025	Nguyen Tuan

Minor						
			audits, including rust, paint condition, and physical integrity.	included in routine GMP inspections or maintenance planning documentation.		
4.7.1	The preventive maintenance plan does not include handling and transport equipment, such as hand trolley.	The engineering department will revise the maintenance plan to include mobile transport equipment such as hand pallet trucks.	Update the maintenance SOP and asset list to categorize equipment including transport tools used in production zones.	The scope of the maintenance SOP did not include transport tools used in production zones.	4/9/2025	Nguyen Tuan
4.9.3.1	A blue clipboard used in the production area was observed with torn surfaces.	The QA team has removed the damaged blue clipboard from the production area. It was replaced with a new, intact, durable clipboard suitable for hygienic use.	Revise the GMP inspection checklist to include condition checks for clipboards and similar non-food contact items.	These items are not included in the GMP inspection checklist, and responsibility for their maintenance or replacement is not assigned.	4/9/2025	Nguyen Tuan
4.11.6	In the production area, cleaning tools (brushes) were observed to have white or transparent bristles, which are difficult to detect visually if they become detached,	The sanitation team will remove and replace existing brushes with tools that have high-contrast, detectable bristles	Revise the sanitation equipment specification to mandate the use of colored bristles for all cleaning tools used in food production areas.	The procurement specification for cleaning tools does not define color requirements for foreign matter detectability. There is also no internal standard or SOP guiding the selection and inspection of	4/9/2025	Nguyen Tuan

Minor						
	posing a foreign matter contamination risk.			hygiene tools based on food safety risk.		
4.11.8.1	The current environmental monitoring plan does not include a documented risk-based rationale for determining sampling frequency.	The QA team will conduct a formal risk assessment of the facility's environment using 4 zon4, and contamination history.	Develop and implement a documented procedure requiring environmental monitoring plans to be risk-based.	There is no procedure requiring environmental monitoring plans to be built upon formal risk assessment.	4/9/2025	Nguyen Tuan
5.4.2	The vulnerability assessment plan does not include details on how certified raw materials are verified and controlled to ensure authenticity and prevent food fraud.	QA and purchasing team to immediately review all certified materials and document how each certification is verified. Update the vulnerability assessment record to reflect this control.	Revise the vulnerability assessment template to include a column for how certified raw materials are verified and controlled	The risk assessment template and procedure for vulnerability assessment do not include a category for certification-based claims.	4/9/2025	Nguyen Tuan
7.1.6	Training records reviewed did not include references to the specific training materials used, which is required to demonstrate the scope	The HR or QA team will revise the training records to include the document name or code of the materials used in each training session.	Revise the training record template to include mandatory fields for name or code of training material.	The training record form template does not include a field for referencing training materials. There is also no internal procedure requiring such documentation, and	4/9/2025	Nguyen Tuan

Minor						
	and content of the training delivered.			trainers are not instructed to archive training content.		

Comments on non-conformities

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Lead auditor		
Auditor number	**First name**	**Second name**
21972	TUAN VAN TRONG NGUYEN	Nguyen Van Trong

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
Tuan	Nguyen Van Trong	21972	Lead auditor	2025-03-10	08:30	17:30	Physical	
Tuan	Nguyen Van Trong	21972	Lead auditor	2025-03-11	08:30	18:30	Physical	
Tuan	Nguyen Van Trong	21972	Lead auditor	2025-03-12	08:30	18:30	Physical	

Hoang	Nguyen Vu Thanh	/	Observer	2025-03-10	08:30	17:30	Physical	
Hoang	Nguyen Vu Thanh	/	Observer	2025-03-11	08:30	18:30	Physical	
Hoang	Nguyen Vu Thanh	/	Observer	2025-03-12	08:30	18:30	Physical	

1. Senior management commitment

The company's senior management showed a strong commitment to meet the requirements of the Global Standard for Food Safety. Quality policy date 2025-01-03 by Truong Thanh Tan – GD displayed at entrance, canteen, locker room to communicate to all staffs. Food safety policy is focus on ensure food safety, food quality and authentic product, comply with all relevant regulation and on-going improvement to satisfy customer by maintain food safety system and improve the site's food safety and quality culture.

Food safety and quality culture development plan was developed based on a confidential food safety and quality awareness survey on all staff to understand the level of their awareness on the core value of company. This survey was reviewed and defined action plan which is clear action plan for all relevant departments which are related to food safety and quality.

Food safety and quality culture plan FM-FSCD-01 date 2025-01-02 was available

Food safety objectives 2025 were updated by Truong Thanh tan – GD on QO-QMR-01 date 2025-01-03 and defined as

1. Revenue 18B VND

2. Develop new products: 2

3. Quality of product: 99.5%

4. Antibiotic: meet 100%

5. Biological: meet 100%

6. Delivery: 100% on time

Company objectives are broken down into department objectives and be the results are monitored monthly. Check Objective report Q4 2024 on 2025-01-07 found satisfaction.

Management review procedure was established (PM-QMR-04 rev. 14 date 2025-01-03) and clearly defined that management review was carried out based on yearly and cover all requirement. Last management review was conducted on 2025-01-10, attendance: include Truong Thanh Tan – GD, Nguyen Thi Phuong Chi – QMR, HACCP team leader and managers (QA, maintenance, HR, Sales, Production).

Management team organise monthly meeting to review all issues of food safety, authenticity, legality, quality issues and report to Director. Check minute of meeting on 2025-02-27 found satisfaction.

Mailbox was available to all staff as confidential report system to report all concerning of food safety, quality, legality and food integrity to senior Management which is reviewed monthly.

At audit opening/ closing meeting, Nguyen Van Thien – Vice Director and Phan Song Ho – Vice Director is a representative as top management.

At the current audit time, Nguyen Van Thien – Vice Director and Phan Song Ho – Vice Director, QA manager, Production manager, Sale staff; Engineering manager, and HR manager were present during the audit time.

Overall, the Management system is effectiveness and be continued relevance and applicability to the scope of certification; top management have strong commitment to maintain the effectiveness and improvement of the management system and contributes to the achievement of the organization's policy and objectives.

The current issue of the BRCGS Standard Version 9 was available and retrievable by anyone with control by QA manager.

The use of logo is complied with BRCGS regulation. Company's representative knows that BRCGS logo was not be used on products or product packaging. Logo is only used on business cards, marketing collateral.

QA Manager is assigned for maintenance of the certification. The company has planned to maintain BRCGS certification as scheduled. Director assigned QA Manager to kept company informed and updated all of scientific and technical developments, industry codes of practice and all relevant legislation applicable, according to document control procedure, by contact the local authority NAFIQAD, VASEP contacting with customers and visit EU food regulation website.

All records about non-conformities raised by external authority and by internal audit were checked and found that all of them were subjected for root cause analysis and corrective actions were implemented adequately, with verification from QA Manager. The result and effectiveness of the corrective actions were included in the latest management review report for General Director to review.

The organization chart updated RE-QMR-01 rev. 15 date 2025-01-03 was in place and communicated to all workers via communication boards. The job duties, qualification, and deputation for all work positions were clearly defined in the correspondence job description. Deputies/replace person are defined in job description and table of function and right of HACCP team. All employees are aware of their responsibility by training at the beginning their job. Management team worked together with their staffs to solve any raised problems. Quality manager is responsible to control all non-conformities identified internally and externally and she is responsible to ensure all CARs completed effectively.

The Responsibilities and Authorities policy (RE-QMR-01 rev. 15 date 2025-01-03) was checked and found satisfaction.

Minor NC/1.1.2: No evidence of evaluation of the effectiveness of the food safety and quality culture plan implemented in 2024.

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

2. The Food Safety Plan – HACCP

HACCP team assignment 01/QD.HACCP.2025 was approved by Truong Thanh Tan – GD on 2025-01-03, include 12 team members comprised from QA, QC, production, engineering, sale. HACCP team leader / Nguyen Thi Phuong Chi (HACCP cert 388/2018/CN-TTCL6, VACCP/TACCP cert no. 19072024/T-VN-05) who has been working in seafood processing more than 30 years of experience in food processing.

Prerequisite programs are clearly established, implemented and maintained by the factory.

The pre-requisite programmes are documented in the GMP, SSOP, specific for every group of product and relevant procedures as Training procedure, Purchasing procedure, food defense, allergen control, and maintenance procedure.

Full descriptions of product were detailed in HACCP manual which includes Product characteristics and Intended use were clearly defined in product description for all production in HACCP plans.

Intend use: RTE for frozen cooked product, cooked before consumption for frozen raw/breaded product, max shelf life 24 months, products are packed in the plastic bag/tray with or without vacuum. Option food additive soaking and marinating depend on customer requirement. Product label design is responsibility of customers, agreement by customers by email before ordering & packing every product lot.

There were 02 HACCP groups for all products.

1. Processing of frozen raw (HM-QCC-02 rev01.2025 date 2025-01-15)

2. Processing of frozen cooked shrimp (HM-QCC-03 rev01.2025 date 2025-01-15)

General process flow for three groups including following steps: Raw shrimp receiving > washing > grading > de-heading > Peeling > Sizing > Soaking (optional) > Breading (if any) > Cooking (if any) > Freezing > Packing in the plastic bag/tray with/without vacuum > Metal detecting > Packing in master carton > Storage > Loading.

Process Flow diagram was verified annually be HACCP team. Last verify on 2025-01-03 15 was checked and found satisfaction.

The potential hazards (Physical, Chemical including radiological hazard, Biological, allergen risks and malicious and food fraud hazard) for raw material, including packaging and potential hazards of each process step were listed and the subjected to analysis.

Adequate information from frozen raw seafood processing were collected from VASEP, NAFIQAD and EU regulations available for hazard analysis done. Check currently HACCP document and external document list found updated and satisfied with current legal requirements.

Detail CCPs and critical limits: all CCPs are identified by using decision tree, critical limit for each CCP and detail of monitoring, corrective action and verification and record monitoring were clearly defined in HACCP plans

CCP1: Receiving raw material:

- Environment chemical (pesticide, heavy metal): Supplier commitment for material from Nafi approved sources. Nafi notification and original document. Monitoring every lot by QC. Verification on record every week and testing on Environment chemical every 6 month.

- Antibiotic: Supplier commitment for material from Nafi approved sources, chemical inspection (CAP, AOZ, enro/cipro, tetracycline group, sulfonamides group) by internal lab every lot. Monitoring by QC every lot. Verification testing for banned antibiotic every 3-6 months.

- Sulphite: Supplier commitment, sulphite inspection. Test every lot by QC. Verified testing every 6 months

CCP2: Cooking.

- Microbiological survive: Temperature at 100 ± 1oC, cooking time based on shrimp size, the temperature of core product ≥ 72oC in at least 1 minute. Verification testing everyday by internal lab and every 2 months by external lab, calibration for monitoring equipment.

CCP3: Breading:

- Toxin from Staphylococcus aureus in batter mix preparation: max using time 3 hours, batter mix temperature < 21oC. Monitoring by QC every battermix batch. Verification testing every 3 months.

CCP4: Metal detecting: every product was checked. Monitoring: check every finished pack by metal detector by trained worker, test sensitivity of metal detector by test pieces (Fe: ø = 1.2mm, Non-Fe: ø = 2.5mm, SUS: ø = 2.5mm, Fe: ø = 20mm) at beginning, every 60 minutes and end of each lots by QC. Corrective action, isolated the finished product from last previous successful testing, repair metal detector and re-test all isolated product. Metal detector checked by manufacturer annually.

CCP5: Labelling

- Allergen information: visual check allergen information. Verification on record every week.

Corrective action plan for each CCP identify with details of action taken when the limits are exceeded. Identified responsible persons i.e. production, supervisor and QA manager. Actions taken included stop line, hold, reject and making decision by QA manager, all were kept in record. Documented corrective action procedure is in place and implemented when the critical limits are not met.

The interviews with persons in charge of CCP monitoring indicated that the procedure is implemented; Ex Ma Thanh Thoang Em at Metal detector, Thach Thi Kim Kieu at Receiving, Pham Van Can at cooking, and Ho Thanh Tuan at Packing. Review of records and interviews with processing staff showed that they were aware of the CCPs and the actions to be carried out.

Annual verification plan 2025 was available based on internal audit activities, verification testing in external lab (ISO 17025).

-The HACCP plan verification on 2025-01-03 found satisfaction.

- RM Vannamei shrimp (Ba Tri 2 farm – Pond B7, G0322 0216 Nguyen Van Giau – My Long Bac, Cau Ngang, Tra Vinh) testing report no. 021719 HL & 021720HL date 2025-02-21 by Nafi 6/VLAT 1.1669 (Ethoxyquin, Trifluralin, aldrin,…)found satisfaction.

-RM Vannamei shrimp (Ba Tri 2 farm – Pond C7, G0011 0116 Nguyen Cong Toai – Long Khanh, Duyen Hai, Tra Vinh) testing report no. 111419HL & 111920HL date 2024-11-21 by Nafi 6/VLAT 1.1669 (Trifluralin, CAP, AOZ, AMOZ, AHD, SEM, …) found satisfaction

- RM HOSO testing report no. 122310VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus) found satisfaction

- Cooked Vannamei shrimp testing report no. 122305HL date 2024-12-28 by Nafi 6/VLAT 1.1669 (CAP, AOZ, AMOZ, AHD, SEM, Enrofloxacin, Ciprofloxacin,…) found satisfaction

- Cooked Vannamei shrimp testing report no. 122313VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus, Listeria) found satisfaction

- Frozen shrimp testing report no. 122309VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus) found satisfaction

Checked validation report for cooking on 2024-11-21~24, soaking on 2024-05-15, and cold storage temperature distribution on 2024-05-29 found satisfaction.

Minor NC/2.6.1: The HACCP team performed an on-site validation of the production process, but there was no documented verification or cross-check against the process flow diagram.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

Quality manual QM-QMR-01 rev. 22 date 2025-01-03 is available and brief on the requirements and reference to detail procedures and instructions in Vietnamese. They were distributed to all department and factory. Procedure to conduct key processes is in written. Besides, GMP manual, a SSOP manual are available to address the hygiene and food safety issues. These manuals were controlled through formalised document control system and distributed to all departments for implementation.

Photos are used as instruction in production area (e.g personal hygiene instruction)

All documents were controlled according to the document control procedure PM-DCC-01 rev. 09 date 2025-01-03, clearly defined identification and authorisation of controlled document, record of any changes in 1st page of document. During onsite and documentation audit, did not found any documents without controlled.

Photos are used as instruction in production area (e.g. personal hygiene instruction at entrance).

The last review for documents, instruction and procedures on 2025-01-03.

Record control procedure PM-DCC-01 rev. 09 date 2025-01-03 is available. Records are kept for 3 years (2 years of shelf life + 12 months). Records were recorded clearly and legible and maintain in good condition. No alteration changing on record found.

3.4 Internal audits

Internal audit procedure PM-QMR-01 rev. 12 date 2025-01-03

Internal audit plan FM-QMR-02 date 2025-02-04 was defined to carry out throughout the year (Feb, May, Aug, Nov) based on risk assessment. All requirements was audit at least once a year.

There were 6 trained internal auditors who are independent from the audited departments. Internal audit plan includes all departments.

Check internal audit on 2024-10-06 record in FM-QMR-03/XXX, there were 5 non-conformances raise during the internal audit about facilities and machine. All CARs were closed as defined timescale verified by internal auditor. The finding no 1-02 on 2024-10-06 (traceability for additive) was checked and completed.

Check internal audit on 2025-02-05~12 record in FM-QMR-03/XXX, there were 8 non-conformances raise during the internal audit about facilities and machine. All CARs were closed as defined timescale verified by internal auditor. The finding no. 1-01 on 2025-02-06 (floor) was checked and completed.

The factory fabrication and hygiene inspection was carried out monthly and record in FM-TEC-02 check hygiene inspection record on 2025-02-10 and 1 finding, completed CAPs found satisfaction.

The results of the internal audit and the factory fabrication and hygiene inspection were included in the management review meeting.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Supplier approval procedure PM-SAL-04 rev. 11 date 2025-01-02 is clearly defined the supplier approval and performance monitoring process.

Raw material and supplier risk assessment FM-RA-02 date 2025-01-02 was carried out before buying and annually. Risk assessment was including identify potential risks of microbiological, chemical, physical, allergen and substitution/fraud, quality, legality to define the level of risk for each supplier.

Vulnerable assessment on food fraud date 2025-03-01 which including historical evidence of substitution, economic factor, ease of access to raw materials through supply chain, sophistication of routine testing, nature of the raw material was checked and found satisfaction.

Supplier approval & assessment Procedure is in place and outline the criteria to select and ongoing evaluate supplier yearly, include:

- 3rd party certification (require GFSI recognised scheme)

- Supplier audit based on checklist

- Questionnaire for low risk suppliers

Raw material of food ingredients and packaging suppliers were assessed on Quality and food safety control (control of materials and traceability, GMP (including allergen control), food defence plan, the product authenticity plan, HACCP), price/ term of payment, supply ability, Quality system based on scoring system to approve supplier.

List of approval suppliers were in place FM-SAL-06 date 2025-01-02 for all suppliers.

Random checked approval record for below supplier found satisfaction:

- Shrimp material was checked every lot by lab (antibiotic) before receiving.

- Ba Tri Farm BAP cert no. F11146 valid until 2025-03-28, ASC cert no VN012035/1 valid until 2027-08-13

- Enfood (Additive), approved via FSSC cert no. 24161606001 valid until 2025-10-26

- Thai Refined (Salt), questionnaire on 2025-02-08

- Tien Thanh (tray), BRCGS site code 1269006 valid until 2025-06-09

- Duy Nhat (PA/PE), BRCGS site code 9373885 valid until 2025-05-24

All raw material buy via broker were adequate controlled and known until last manufacturer, all document from the last manufacturer was obtained and retain.

All suppliers after approval were on going monitored every delivery and reviewed their performance annually. Exception supplier approval process was clearly defined in supplier approval procedure, exception supplier including supplier prescribed by customer, buying in urgent case, imported raw material, exclusive supplier)

Minor NC/3.5.1.1: The risk assessment for raw materials did not include evaluation of the risk of species cross-contamination.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The raw material and packaging acceptance procedure was defined (PL-LAB-02 rev01.2025 date 2025-02-25) was available. All raw material and packaging were inspected at receiving step including organoleptic, quantity, sampling to test microbiological and chemical (depending on each type of raw material), temperature, specification, CoA, CoC, hygiene condition of vehicle, label information.

Random checked receiving record for below raw materials found satisfaction.

-Raw shrimp lot no BAX444 date 2024-11-14 with qty 9492.1kgs from supplier Ba Tri 2, receiving record FM-QCC-02/VAN-BT was checked, testing record no. 241113 date 2024-11-13 by internal lab/365 (AOZ, CAP, enro, cipro, tetracycline group, sulfonamides group) found satisfaction.

5000kgs (used 705kgs) from A Chau.

-Salt lot no HCSX00002/08 date 2024-10-01 with 16MTs from Thanh Phat.

-512new lot no HCTT00035/07 date 2024-10-23 with 16MTs from Chau Au.

-Cocktail Sauce 113.4g lot no 7T030-2(NOX) date 2024-09-25 with 2972ctns = 178320cups

-Ring Tray lot no D6 date 2024-10-10 with qty 35000pcs from Hung Thinh supplier. Verification testing report no. 00251-1/N3.24/DG date 2024-03-08 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

-PE skinpack lot no. SP00048/04 with qty 1440 rolls = 475200m from Duy Nhat supplier. Verification testing report no. KT3-05999AHD4 date 2024-11-18 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

3.5.3 Management of suppliers of services

Supplier of service approval process was clearly defined in PM-SAL-04 rev. 11 date 2025-01-02

Suppliers of Services included the following: transportation, harmful waste, by product, normal waste control, testing, calibration, maintenance.

Supplier of service was approved by evaluated on quality, delivery, price, service or accredited certificate (laboratory, calibration) or license certificate (harmful waste) and all scope of service was defined in agreed contract. The ongoing performance monitoring record was available.

Check the approval record for below supplier of service found satisfaction.

+ Harmful waste handling by contracting with Moi Truong Thanh Lap supplier according to contract no. 1001/2025/HĐKT/TL-TSCL date 2025-01-10

+ General waste collected by CTDT Tra Vinh contract no. 116/2025/CTĐT/HĐ-VCR date 2025-01-07

+ By product collected by Minh Van contract no. 03/HĐMV/2025 date 2024-12-26.

+ Testing service with accredited laboratories (ISO 17025)

+ Pest spray by VFC contract no. 96.24/PCO-NSH date 2024-06-10

+ Calibration service with authorized agency

+ Transportation by Gia Nguyen, contract No. GN20240230V date 2024-06-28

3.5.4 Management of Outsourced processing

No outsourced process

3.6 Specifications

Company have reviewed all specification of raw materials, packaging semi-products and finished products that consists of specs. All specifications are reviewed every 3-years or reviewed immediately when any change effective food safety.

- Shrimp (SP-TEC-01 rev. 8 date 2025-01-03)

- Additive 512plus, salt (SP-TEC-04 rev. 11 date 2025-01-03).

- Water (PL-LAB-01/NTC-F2 rev02.01.2025 date 2025-01-02)

- Cocktail sauce (SVDD17-23 rev3 date 2023-06-28)

- PA/PE (SP-TEC-05 rev. 8 date 2025-01-03) according to QCVN:12-1/2011/BYT and EU regulation 94/62/EC and 10/2011

- Product specification (SP-TEC-02 rev. 6 date 2025-01-03 + SP-TEC-03 rev. 7 date 2025-01-03)

Finished products complied with Customer requirements, Vietnam National Standard & EU requirements for seafood had been covered with most updated banned additives for processing (QD 2864/BNN-QLCL, 1471/BNN-QLCL, QD46/2007/QD-BYT, QCVN8-1:2011/BYT, QCVN8-2:2011/BYT, QCVN8-3:2011/BYT). When customer have specific requirement on product (product recipe, process, technological, packaging type, labelling), these additional requirements will be agreed in contract and transformed to production guideline for the implementation. Production specifications were used in the factory and were well controlled. Checked specification of Frozen cooked shrimp ring with sauce lot BAX444 (contract HDB11-2024/327TO329 date 2024-11-01 with C.P.Food, specification date 2024-01-04, APC <5x10n5cfu/g, total coliform <10n3cfu/g, e.coli <10cfu/g, sal ND/250g, Lis mono ND/250g, CAP ND, Gentian Violet ND, Flouroquinolones ND, MG ND, nitrofurans ND, OTC ND, sulfite <10ppm) found satisfaction.

Example contract HDB11-2024/327TO329 date 2024-11-01 with C.P.Food were reviewed for products Frozen cooked shrimp ring with sauce lot BAX444. Production specifications were used in the factory, including photographic standards and were well controlled.

3.7 Corrective and preventive actions

Corrective action procedure (PM-QMR-02 rev. 12 date 2025-01-03) was established. All records about non-conformities raised by external authority NAFIQAD (date 2024-11-27 with 19 NCs) and by internal audit and previous audit were registered in log. Checked randomly the corrective action of NC from internal audit found compliance. The NCs were subjected for root cause analysis and corrective actions were implemented adequately, with verification from QA Manager. The result and effectiveness of the corrective actions were included in the latest management review report for Director to review.

3.8 Control of non-conforming product

Non-conformity product control procedure is documented (PM-TEC-10 rev. 10 date 2025-01-03)

Quarantine area & marks were available as defined on procedure. Instruction for potential Non-conforming product produced when CCP out of control is defined clearly in HACCP plan.

Product that rejected by metal detector is put in locked inox container with clear label “Potential metal contaminated product”. Interviewed during audit, all staff clearly understood process

Staff trained on NC handling procedure available and trained on the same for QA and food handlers. Clear process well understood by the staff that were interviewed during the audit.

3.9 Traceability

The Identification, Traceability procedure PM-TEC-07 rev. 14 date 2025-01-03 is available. Code of each raw material group including packaging for identification and how the traceability system works and labelling and required records was clearly defined. Adequate records allow tracing to raw material & vice versa Product ID with name, size, lot number, manufacture date & expiry date are clearly defined in packaging.

Traceability test was done every 12 months in both backward and forward.

Traceability test forward on 2025-01-10, and backward on 2024-12-12 for Cooked PTO Sushi vannamei shrimp, lot no. VN 031 VI 002 KOR with customer Woowong Holding INS, Production date 2024-08-30 with qty 1148 ctns. Traceability test including mass balance summary show complied with company target, traceability test completed within 2h11'.

On site traceability test from finished product to raw material for product Frozen cooked shrimp ring with sauce lot BAX444, production date 2024-11-14, quantity 4284ctns = 5826.24kgs, shipped to customer C.P.Food date 2024-12-08 on cont/seal MNBU4235780/ML-VN0032325. Random checked mass balance of following raw material, food ingredient and primary packaging, detail:

- Frozen cooked shrimp ring with sauce lot BAX444, testing report no. 241116 date 2024-11-16~20 by internal lab/vilas365 (TPC, coliform, e.coli, sal, Vc, Vp, AOZ, CAP, enro, cipro, tetracycline group, sulfonamides group) found satisfaction. Testing report no. 090901UH date 2024-09-12 by nafi6/124 (SEM ND, MG ND, LMG ND, Enro ND, Cipro ND, CV ND, LCV ND, Fipronil group ND) found satisfaction. Testing report no. 752247 date 2024-11-27 by SGS/237 (TPC, coliform, e.coli, lis mono, sal spp, s.aureus, Vp, moisture, P2O5, SO2, CAP, OTC, CV/LCV, MG/LMG, AOZ, AMOZ< AHD, SEM, Flouroquinolones, Cipro, Dano, Diflo, Enro, Sara, Na) found satisfaction.

-Raw shrimp lot no BAX444 date 2024-11-14 with qty 9492.1kgs from supplier Ba Tri 2, receiving record FM-QCC-02/VAN-BT was checked, testing record no. 241113 date 2024-11-13 by internal lab/365 (AOZ, CAP, enro, cipro, tetracycline group, sulfonamides group) found satisfaction.

5000kgs (used 705kgs) from A Chau.

-Salt lot no HCSX00002/08 date 2024-10-01 with 16MTs (used 160.4kgs) from Thanh Phat.

-512new lot no HCTT00035/07 date 2024-10-23 with 16MTs (used 320.8kgs) from Chau Au.

-Cocktail Sauce 113.4g lot no 7T030-2(NOX) date 2024-09-25 with 2972ctns = 178320cups (used 34291cups)

-Ring Tray lot no D6 date 2024-10-10 with qty 35000pcs (used 34291pcs) from Hung Thinh supplier. Verification testing report no. 00251-1/N3.24/DG date 2024-03-08 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

-PE skinpack lot no. SP00048/04 with qty 1440 rolls = 475200m (used 3630m) from Duy Nhat supplier. Verification testing report no. KT3-05999AHD4 date 2024-11-18 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

The monitoring record of CCP/GMP/SSOP of Frozen cooked shrimp ring with sauce lot BAX444 was checked.

The test include mass balance was successful completed within 4 hours

Reworking is done within the same lot only, and no occurrence. The finish goods in temporary cartons will with adequate information label allow traceability directly to supplier, the carton changing was kept record, the origin batch kept on carton of finish goods.

3.10 Complaint-handling

Company procedure PM-SAL-03 rev. 11 date 2025-01-02 was in place and implemented. Complaints and handling will be communicated with customers by e-mail and telephone.

There were 4 complaints from 2024 up to audit date from customer (1 on foreign matters, 1 on food safety, 2 on quality). All complaints were investigated the root cause and take corrective action and response to customer.

-Customer complaint report date 2024-02-15 from customer DKSH for product lot 221435 about Chlorate index exceeded the standard, however, the product has not yet left the factory, the complaint was done with root cause analysis, correction and corrective action was found satisfaction by customer.

-Customer complaint report date 2024-12-09 from customer Fishin for product lot 221435 about foreign matter (hard plastic piece from packaging) in product, the complaint was done with root cause analysis, correction and corrective action was found satisfaction by customer.

3.11 Management of incidents, product withdrawal and product recall

The incident management procedure PM-PER-10 rev. 6 date 2025-01-03 were in place. The incident management team consists of 7 members led by Truong Thanh Tan – Director and responsibilities were clearly defined. Contingency planning for emergency response procedure included: disruption to key services such as water, energy, transport, staff availability and communications events such as fire, flood, malicious contamination or sabotage and responsibilities with communication channels and contact list were established and implemented. Security of water supply, material reception, ingredient store, chemical store, finish product store were also taken into account and identified in the procedure. Documented guidance for emergency response to food safety, quality and legality issues is in place with defined communication channels and contact list. Current system has capable of being operated in the whole company.

Covid19 control: all staffs with 3 dose vaccines at least, daily checking temperature and Alcohol hand washing for all employee. Health questionnaires were completed by visitors and contractors and check before coming to factory as procedures

Recall procedure PM-SAL-08 rev. 01.2025 date 2025-01-03 is available.

Recall management team have 6 members wad leaded by BOD and QA team.

List of contact included directly clients, certification body and authority office is in place. List of key contact was verified, defined responsibilities of each members.

Mock recall is done at least once per year. Last mock recall on 2025-02-19 for Cooked PTO vannamei shrimp half moon ring with sauce, lot no. PO: P841777 with customer Aqua star , Production date 2024-06-10 with qty 3112 ctns. Communication between company and customer was in place.

No product recall/withdrawal occurred, and related procedure and traceability system are mutually used for such control.

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

4. Site standards
4.1 External standards
Suitable site, location, construction and design for seafood processing have been confirmed by local authority agency and GMP, SSOP and HACCP manual available for control of food safety. Factory location is adequate controlled & fit to food processing activities. Site environment and conditions are inspected monthly by the site. Surrounded by fence in well maintained. Internal road made of concrete. The processing buildings are adequate enclosed. Internal road are built with bitumen, clean. No local activities that would risk product. Areas for living, office, waste handling and production are separated.
4.2 Site security and food defence
Food defence control procedure was in place (PM-PER-03 rev. 12 date 2025-01-03). The food defence team was established with 16 trained team members, team leader is Mrs Chi. Site security and food defence plan date 2025-01-03 based on risk assessment was done and defined the controlled measure. The verification test for the food defence plan was performed every year, the last verification test was done on 2025-01-10 found satisfaction. The food defence plan was reviewed every year in the management review meeting. All restricted areas (packing room, loading area, IT room, CCTV monitoring room, water treatment, Security room, dry goods store, packaging store, cold store, chemical store, machine room, QA department, Lab were limited access and controlled by authorise staff and locked under key. All areas were monitored by CCTVs and checked by security staff. Any unnormal activity will be recorded and reported to manager. Water storage tank was locked under key. All visitors and contractors declare information at main gate. Visitor was guided and supervised by accompany staff. All new staffs were trained awareness of site security procedure before working.
4.3 Layout, product flow and segregation
Factory maps date 2024-01-03 were clearly defined production zone (high risk, low risk and enclosed areas defined after vacuum packing). There are 2 building of production, rooms segregation and dedicated for 02 production lines for frozen raw and cooked products.

All personnel, raw material, food ingredients, packaging, waste access points and route were clearly defined in map. All sections are well segregated with walls & closed door. Sufficient working space and storage capacity were provided. Working space between processing / packaging/ pre-storage are clear identified & separated with enough space for job handling under safe hygienic conditions.

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

The company was constructed in 2005. All walls are coated by ceramic, smooth, water proof wall, bright color, maintained in clean and good condition and easy for clean. Floors is smooth with grinding stone and well maintained. Drainage is properly designed & maintained with coated by inox. Floors have appropriate gradient to support water flow to water hole & trap. Ceilings were covered by suitable material of plastic for easily cleaning & washing and well maintained.

Glass windows with adhesive plastic sheet to protect against breakage. All doors are kept close and in raw materials have plastic curtains. Air is well flown in production area. Lighting system was sufficiently provided with suitable plastic covers.

Minor NC/4.4.4: In the preprocessing zone, several small holes were observed on plastic ceiling panels. Although the holes were not located directly above open product zones.

Minor NC/4.4.8: An external access door to the processing building does not have any insect control barrier to prevent flying insect ingress when opened.

4.5 Utilities – water, ice, air and other gases

Water control procedure SM-TEC-01 rev11 date 20255-01-02 was established. Ice was made from portable water after treatment.

The water came from City already treated and re-treated by the company (sand, stone, active charcoal, filter, chlorine, filter), water quality is complied with EU regulation 2020/2184 and Local law QCVN 01:2018/BYT.

Water taps were numbered fully, in low production, the distribution system was reviewed, maintained necessary taps to reduce void taps, layout last updated date on 2020-01-02.

The quality of the production water (chlorine 0.2-1ppm) was checked every day by internal lab. Checked record on Feb 2024 found satisfaction.

Water was tested microbiological (TPC 10cfu/10ml, clostrida 0cfu/100ml, E.Coli 0cfu/100ml, Coliform 0cfu/100ml) weekly by internal lab. Testing report on 2025-03-05 found satisfaction.

Water was tested microbiological, chemical and physical 4 times/year for monitoring and twice a year for verification by external lab. Verification testing report no. 122413HL + 122412VL date 2025-01-03 by nafi6/1.1669 found satisfaction and complied with 2020/2184 and QCVN 01:2018/BYT

No boiler chemical use, the boiler used treated water directly from water treatment plant.

Air, other gases, steam and compressed air was not used.

4.6 Equipment

The equipment control procedure PM-TEC-12 rev12 2025-01-03 was available to control all equipment used in the factory including installation of new equipment and relocation of static equipment. New equipment requires food safety team approval before use. A list of equipment updated was available. The equipment is appropriately designed, by stainless steel and has confirmation from the equipment manufacturer that they are suitable for food contact. Equipment is positioned easily for access & maintenance. All Battery-charging equipment is collected and stored in a separate area. Check the plastic tank COA found satisfaction. There was no new production and product-handling equipment.

Minor NC/4.6.6: Several hand trolleys in the preprocessing area were observed to have visible signs of rust and peeling paint

4.7 Maintenance

Engineering department has the procedure PM-TEC-12 rev12 2025-01-03 to control all equipment using in factory

List of equipment and maintenance plan 2025 FM-MEC-01 dated 2025-01-20 are available.

Maintenance tool boxes for production area were dedicated and retained in areas.

The maintenance record on Jan 2025 (flake ice machine, cooking machine, metal detector, soaking machine,…) was checked and found satisfaction.

Klubersynth UH1 14-151 grade H1 (NSF cert no. 056354). No allergen contains as confirmation letter from supplier.

All equipment after maintenance checked by production QC control this area. Almost maintenance by in house. All maintenance recorded and verified by Maintenance Manager. Documented hygiene inspection on start-up completed by QC supervisors. All records were found acceptable.

Engineering workshop is located separately and found clean, tidy during the onsite audit.

Minor NC/4.7.1: The preventive maintenance plan does not include handling and transport equipment, such as hand trolley.

4.8 Staff facilities

Sufficient facilities provided for personal items storage before entering main building. Designated changing rooms provided for staffs work at each area & visitors. Clothing, hair net incorporated with mask, gloves, apron and boot provide all staffs and visitor prior to entry to production area. Control in place to prevent re-use of disposable hair net & mask for visitors.

Nominated staff full-time supervising at entrances. Boots washing facilities during hand washing directly access to entrance of production.

All entrance ways to production areas/packing area/storage, the necessary facilities are installed such as chlorine sink for boot sanitizing; Exclusive hand-free washing facilities & alcohol spray, tissue were available. Assigned QC is responsible for checking and control of personal hygiene practices.

Smoking only permitted outside at designated area. Canteen facilities locate externally far from production. All food not permits into production area.

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

4.9.1 Chemical control

Chemical control procedure (SSOP 06 rev. 11 date 2025-01-02) and chemicals list is in place. Separate chemical storage of chlorine, alcohol and detergent with clear label & stock card to control by trained storekeeper. All chemicals used for cleaning in processing area were attached with labels and MSDS. Storage key is only kept by storekeeper and no one can access to the chemical store if not authorized. Chemical store are always locked and has a warning sign “for authorized person only” posted on the door.

4.9.2 Metal control

Metals control policy defined in PM-TEC-08 rev. 2 date 2025-01-03 was in place. List of items forbidden in packaging area is in place. Staples and paper clips are not allowed to be used in all processing areas under control of QC. Only production blades are allowed using under control of QC. Blades were numbered, issued and returned daily. Checked and found no used snap-off blade knife. Daily inspection record is maintained by QC. Checked record on 2025-03-10 found satisfaction

4.9.3 Glass, brittle plastic, ceramics and similar materials

The control procedure for glass, wood and brittle plastic PM-TEC-08 rev. 2 date 2025-01-03 included glass breakage protocols has been implemented.

Potential place & location of glass windows, doors and lights are specified in layout drawing and light and glass register PM-TEC-08 rev. 2 date 2025-01-03, controlled by QC team. Production tool was checked daily, checked record on 2025-03-10 found ok. Lamp, glass and door were checked daily, checked record on 2025-03-10 found satisfaction. Detail about countermeasure for happened breakages was clearly defined in procedure. Finished products were packed into PE/PA plastic bags.

Minor NC/4.9.3.1: A blue clipboard used in the production area was observed with torn surfaces.

4.9.4 Products packed into glass or other brittle containers

No glass bottle, container are used.

4.9.5 Wood

No wood pallet used in production area
4.9.6 Other physical contaminants
De-bagging and de-boxing procedures (SSOP 05 rev. 10 date 2025-01-02) to remove the packaging is clearly defined to prevent physical contamination of raw materials by raw material packaging. The pens used in open production areas were designed without small pieces and detectable by metal detectors
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
Foreign body control measures included in-line metal detection and in-line checking and remove. Metal detectors are installed at the last step of production area, after the product is packed. Metal detector has a belt stop system.
4.10.2 Filters and sieves
No use filters, sieves
4.10.3 Metal detectors and X-ray equipment
Metal detectors were correct located, directly after packed in PE bag, which defined as CCP; detectors was belt stop & visual alarm were tested at the beginning and end of the shift & every 60 minutes with metal detector by test pieces (Fe: ø = 1.2mm, Non-Fe: ø = 2.5mm, SUS: ø = 2.5mm, Fe: ø = 20mm). An identified container with lock is provided at metal detector to keep suspected product. Metal detector monitoring work instruction is posted on site. Sensitive checking were witnessed & interview during on site visit with QC in-line, awareness of failure process by staff well demonstrated: promptly isolating relevant products by counting the quantity of carton based on record maintained. Detected product will be initial records for further investigate by QC up stream steps.
4.10.4 Magnets
No magnet is used in the processing line.
4.10.5 Optical sorting equipment
No optical sorting equipment is used.
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No glass jars, cans and other rigid containers are used.
4.10.7 Other foreign-body detection and removal equipment
No other foreign-body detection and removal equipment
4.11 Housekeeping and hygiene

Cleaning procedure SSOP02 + SSOP03 rev11 date 2025-01-02 and cleaning instruction for each equipment defined the specific cleaning for production equipment & building fabric. Manual cleaning method by production staff, clear responsibilities defined. The cleaning chemical is liquid soap & disinfecting with chlorine solution & final rinsed with potable water on begin of production.

There was at least 1 cleaning worker for each area to cleaning remain in floor, all equipment after used will be collected to cleaning tools area and cleaned. The ceiling was cleaned every shift. All cleaning tools were clear indicated and segregate to each function (use to ceiling, wall, floor, equipment, tools).

Frequency: 0.5h/time for gloves worker, each used time for production tools, daily for wall/floor, weekly for ceiling.

Daily hygiene check is done. QC is responsible for checking cleaning and hygiene conditions in whole processing with full SSOP and GMP daily records. Checked record on Jan 2025 found satisfaction. The hygiene condition was in good condition during the site tour audit.

Environmental monitoring programme was done by microbiological swabbing plan (PL-LAB-04/F2 date 2025-01-02) which is based on risk assessment (F-DGRR-06 date 2024-01-04) according to using a Zones 1-4 approach. All area in production (food contact and non food contact surfaces were random and rotating tested microbiological (TPC (<10/100cm2), Coliforms (-), E.coli (-), Sta.spp (<10/100cm2), S.aureus (<10/100cm2), V.cholera (-), V.parahaemolyticus (-),V.vulnificus (-), Salmonella (-), Listeria monocytogenes (-)) by internal lab weekly and verification by external lab every 6 months.

- Testing report no 50225VSCN/25 date 2025-03-03 by internal lab (hands worker, PE, conveyor, basket, table, boots, floor, wall, ceiling, air,…) found satisfaction

- Testing report no 50218VSCN/25 date 2025-02-28 by internal lab (hands worker, glazing machine, material tank, drained line, air,…) found satisfaction

- Testing report 50227VSCN/25 date 2025-03-05 by internal lab (PPE) found satisfaction

- Verification testing report no 111408VL date 2024-11-18 by nafi6/1.1669 found satisfaction

- Trend analysis report for Environmental monitoring programme was done every 3 months, the report on 2025-01-02 was checked.

Minor NC/4.11.6: In the production area, cleaning tools (brushes) were observed to have white or transparent bristles, which are difficult to detect visually if they become detached, posing a foreign matter contamination risk.

4.11.7 Cleaning in place (CIP)

No CIP application.

4.11.8 Environmental monitoring

Environmental monitoring programme was done by microbiological swabbing plan (PL-LAB-04/F2 date 2025-01-02) which is based on risk assessment (F-DGRR-06 date 2024-01-04) according to using a Zones 1-4 approach. All area in production (food contact and non food contact surfaces were random and rotating tested microbiological (TPC (<10/100cm2), Coliforms (-), E.coli (-), Sta.spp (<10/100cm2), S.aureus (<10/100cm2), V.cholera (-), V.parahaemolyticus (-),V.vulnificus (-), Salmonella (-), Listeria monocytogenes (-)) by internal lab weekly and verification by external lab every 6 months.

- Testing report no 50225VSCN/25 date 2025-03-03 by internal lab (hands worker, PE, conveyor, basket, table, boots, floor, wall, ceiling, air,…) found satisfaction

- Testing report no 50218VSCN/25 date 2025-02-28 by internal lab (hands worker, glazing machine, material tank, drained line, air,…) found satisfaction

- Testing report 50227VSCN/25 date 2025-03-05 by internal lab (PPE) found satisfaction

- Verification testing report no 111408VL date 2024-11-18 by nafi6/1.1669 found satisfaction

- Trend analysis report for Environmental monitoring programme was done every 3 months, the report on 2025-01-02 was checked.

Minor NC/4.11.8.1: The current environmental monitoring plan does not include a documented risk-based rationale for determining sampling frequency.

4.12 Waste and waste disposal

Waste management is regulated SSOP 10 rev. 11 date 2025-01-02. By-products collected in dedicated containers, regularly remove out of processing by nominated staff through dedicated hatches. Period collected & transferred by contractor- everyday, the waste room maintained in clean, door maintained enclosed.

+ Harmful waste handling by contracting with Moi Truong Thanh Lap supplier according to contract no. 1001/2025/HĐKT/TL-TSCL date 2025-01-10

+ General waste collected by CTDT Tra Vinh contract no. 116/2025/CTĐT/HĐ-VCR date 2025-01-07

+ By product collected by Minh Van contract no. 03/HĐMV/2025 date 2024-12-26.

4.13 Management of surplus food and products for animal feed

Surplus Customer-branded products is managed by company based on procedure PM-TEC-05 rev01.2025 date 2025-01-03. Customer brand names before using for other purpose must be informed and get approved from customer. All customer's brand names are removed out of packaging via cutting before transferring final product into other packaging.

Food waste is used for animal feed was collected to container with cover and remove regularly by truck by waste collection contractor. Food waste was stored separated from other waste.

4.14 Pest management

Pest control procedure SSOP09 rev11 date 2024-01-03 is in place and performed internal team and external expert.

Fumigation was done by VFC every month (2 times). All chemical and concentration used was recorded. Last treating on 2025-03-05 by approved chemical (Permekill 50EC, Permecide 50EC) was checked

Rat trap layouts was in place with 63 rat traps. Daily checked by internal staff and monitoring every month (2 times) by VFC.

Flier trap layouts was in place with 13 traps. Weekly checked by internal staff.

The depth assessment was carries out annually by VFC service. Checked last report on 2025-03-07 found satisfaction.

Trends analysis is conducted every 3 months, trend analysis record on 2025-01-30 was checked shows no significant increase of pest, no significant activity of specific piece of insect occurred

All new staffs were trained about the pest activity and awareness of pest control in factory before working and refreshed training annually.

There was no pest found in onsite audit

4.15 Storage facilities

Defined in PM-TEC-05 rev. 01.2025 date 2025-01-03 manuals stacking policy was compliance to maintained suitable storage condition of specific material, packaging, finish goods. Cold storage capacity 4900MT (-18 Degree Celsius or below). Actual temperature is monitored by auto-recording thermometer. Data is printed out and verification by QA Manager.

Packaging, ingredient and finished product stores were checked and found satisfactory. Packaging was stack on pallet and put on shelf with identification tag. Primary packaging was kept separated with secondary packing in double packaging. Food ingredients were kept is dry good store. Different ingredients were kept in separated pallet with clearly identification tag and allergen information. The ingredients and packaging materials were identified with stock cards to facilitate correct stock rotation of goods in ingredients storage

Controlled atmosphere storage is not required. No storage outside was applied.

4.16 Dispatch and transport

Defined in transport procedure PM-TEC-05 rev. 01.2025 date 2025-01-03, cold transportation, requirements of loading condition was documented and implemented. Finished products were transported at temperature of -18 Degree Celsius or below. Inspection of transportation included: hygiene condition, container condition & confirm temperature before loading, loading duration kept in record. Transportation of final product by them shelf and by supplier, checked record of Frozen cooked shrimp ring with sauce lot

BAX444, production date 2024-11-14, quantity 4284ctns = 5826.24kgs, shipped to customer C.P.Food date 2024-12-08 on cont/seal MNBU4235780/ML-VN0032325 found compliance.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.3.5	No temporary structure constructed during building work at audit time
4.5.3	No air, other gases used directly in contact with or as an ingredient in products
4.9.4	No products packed in glass
4.10.2	No filters & sieves used
4.10.4	No magnet used
4.10.5	No optical sorting equipment
4.10.6	No glass jars, cans & other rigid container
4.11.7	No CIP operation
4.11.8	Product label state fully cook before consuming.
4.13	No surplus customer-brand product sent for animal feed
4.15.4	No controlled atmosphere storage required
4.15.5	No outside storage

5. Product control

5.1 Product design/development

The New Product Design procedure PM-TEC-01 rev. 12 date 2025-01-03 was established. There is no new product development up to audit date. Other changes/ modification in ingredient, packaging, suppliers and process parameter will be validated by HACCP team leader prior to implementation.

Product shelf-life verification plan was in place. Product was checked microbiological follow finished product specification and organoleptic (appearance, color, odour, flavour, texture) at beginning of shelf life and every 3 months during shelf life study. Random checked shelf life study for below product found satisfaction.

+ Frozen Cooked PTO vannamei shrimp ring with sauce, production date 2025-01-05. Shelf life 24 months. Last checking for microbiological and organoleptic on 2023-01-04 found satisfaction.

+ Frozen Raw PTO vannamei shrimp IQF, production date 2025-01-05. Shelf life 24 months. Last checking for microbiological and organoleptic on 2025-01-05 found satisfaction.

5.2 Product labelling

The labelling and artwork approval procedure PM-SAL-11 rev. 4 date 2025-01-02 was available, label information is responsibility of customers, the artwork got approved by customer before ordering of packaging label by every lot. Product labelling was checked and found complied with current formula & national legislation, customer requirements and EC regulation 1169-2011. The label of Frozen cooked shrimp ring with sauce lot BAX444 was checked and found satisfaction.

5.3 Management of allergens

Allergen management procedure PM-TEC-06 rev. 9 date 2025-01-03 was in place and implemented. Adequate information from suppliers was collected for risk assessment, included in food safety hazards analysis. Allergen list was in place and based on EU regulation. Allergen contain in raw material was obtained from supplier before buying and checked raw material specification by QA.

Allergen present on site, production line & product was defined: shrimp, mustard, gluten. Adequate identification of materials, container, facilitate and food contacts surface. Suitable segregation was maintained. Production plan was done for each product which different allergen contained, SSOP of personal hygiene defined no food bring allowed. All information of the finished product was clearly defined in the product label.

No claim is made regarding the suitability of a food for allergy or food sensitivity sufferers

Refresh training on allergen was provided to all staffs, record is available.

Verification of allergen cleaning on food contact surface by test kit 3M every product change, checked record on May 2024 found OK

5.4 Product authenticity, claims and chain of custody

The food fraud control procedure (PM-PER-03 rev. 12 date 2025-01-03) was available. The vulnerability assessment team was established with 16 trained team members, team leader is Mrs Chi. The site is kept inform of issues by the fishery industry association, authority agents. Site has assessed the raw materials about risk of adulteration or substitution. Vulnerability risk assessment for all raw material was carried out annually. The risk of food fraud was defined for certificate material, and mixed material. All certificate material was come from internal farm, and quality inspection of every lot. No major risk of risk of adulteration or substitution. Vulnerable assessment on food fraud date 2025-03-01 which including historical evidence of substitution, economic factor, ease of access to raw materials through supply chain, sophistication of routine testing, nature of the raw material was checked and found satisfaction. The vulnerability assessment plan based on assessment result was available. Annual review in the management review meeting was checked.

Claim is made about the production method: BAP, ASC. The production flow of assured products is found satisfaction.

- ASC cert no. ASC-C-01100 valid until 2025-08-11

- BAP cert no. P10268 valid until 2025-06-21

Minor NC/5.4.2: The vulnerability assessment plan does not include details on how certified raw materials are verified and controlled to ensure authenticity and prevent food fraud.

5.5 Product packaging

The product was packed in plastic bag/tray with or without vacuum. Specifications for PE/PA packaging were complied with current legislation. Annual verification test, confirmation letter by suppliers collected when first approval & kept on file

In main warehouse, packaging are kept on pallets. Primary packaging is stored in closed carton and PE bags.

Migration analysis record was in place for packaging material and found complied with national regulation QCVN 12:2011/BYT and EC regulations

-Tray from Tien Thanh supplier (BRCGS site code 1269006 valid until 2025-06-09). Verification testing report no. KT3-00438AHD4 date 2024-02-26 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

-PE/PA bag from Duy Nhat supplier (BRCGS site code 9373885 valid until 2025-05-24). Verification testing report no. KT3-05999AHD4 date 2024-11-18 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

-Ring Tray from Hung Thinh supplier. Verification testing report no. 00251-1/N3.24/DG date 2024-03-08 by QT3 from supplier for Heavy metal, migration matters found satisfaction with EU regulation 10/2011, 94/62/EC and Vietnamese regulation.

5.6 Product inspection, on-site product testing and laboratory analysis

Company have sampling plan PL-LAB-02 rev01.2025 date 2025-02-25 was in place with detail instruction of sampling protocol, together with HACCP plan for inspection & analysis. Testing and inspection schedules were defined in sampling procedure while all materials were tested both externally and internally. The frequency of the testing is based on the requirements of authority, customer, and market. The internal lab was tested chemical (antibiotic) in material and product every lot, and pathogen in product every lot. The material and product was verified by external lab 3-6 month or based on customer requirements.

Analyses critical to product safety or legality are done by Internal lab/365, Intertek/278, nafi5/1.1669, SGS/237).

Random check the below results found satisfaction:

- Frozen cooked shrimp ring with sauce lot BAX444, testing report no. 241116 date 2024-11-16~20 by internal lab/vilas365 (TPC, coliform, e.coli, sal, Vc, Vp, AOZ, CAP, enro, cipro, tetracycline group, sulfonamides group) found satisfaction. Testing report no. 090901UH date 2024-09-12 by nafi6/124 (SEM ND, MG ND, LMG ND, Enro ND, Cipro ND, CV ND, LCV ND, Fipronil group ND) found satisfaction. Testing report no. 752247 date 2024-11-27 by SGS/237 (TPC, coliform, e.coli, lis mono, sal spp, s.aureus, Vp, moisture, P2O5, SO2, CAP, OTC, CV/LCV, MG/LMG, AOZ, AMOZ< AHD, SEM, Flouroquinolones, Cipro, Dano, Diflo, Enro, Sara, Na) found satisfaction.

-Raw shrimp lot no BAX444 date 2024-11-14 with qty 9492.1kgs from supplier Ba Tri 2, receiving record FM-QCC-02/VAN-BT was checked, testing record no. 241113 date 2024-11-13 by internal lab/365 (AOZ, CAP, enro, cipro, tetracycline group, sulfonamides group) found satisfaction.

5000kgs (used 705kgs) from A Chau.

- RM Vannamei shrimp (Ba Tri 2 farm – Pond B7, G0322 0216 Nguyen Van Giau – My Long Bac, Cau Ngang, Tra Vinh) testing report no. 021719 HL & 021720HL date 2025-02-21 by Nafi 6/VLAT 1.1669 (Ethoxyquin, Trifluralin, aldrin,…)found satisfaction.

-RM Vannamei shrimp (Ba Tri 2 farm – Pond C7, G0011 0116 Nguyen Cong Toai – Long Khanh, Duyen Hai, Tra Vinh) testing report no. 111419HL & 111920HL date 2024-11-21 by Nafi 6/VLAT 1.1669 (Trifluralin, CAP, AOZ, AMOZ, AHD, SEM, …) found satisfaction

- RM HOSO testing report no. 122310VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus) found satisfaction

- Cooked Vannamei shrimp testing report no. 122305HL date 2024-12-28 by Nafi 6/VLAT 1.1669 (CAP, AOZ, AMOZ, AHD, SEM, Enrofloxacin, Ciprofloxacin,…) found satisfaction

- Cooked Vannamei shrimp testing report no. 122313VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus, Listeria) found satisfaction

- Frozen shrimp testing report no. 122309VL date 2024-12-26 by Nafi 6/VLAT 1.1669 (TPC, Coliforms, Ecoli, Staphylococcus, Salmonella spp, V. chlolerea, V.parahaemolyticus, Clostridium perfringens, V.vulnificus) found satisfaction

The company has the internal Lab was accredited ISO 17025 with vilas 365. The company maintained a well-designed laboratory segregated from the production and storage areas, the procedure in place to control cross contamination during sampling, testing, defined in lab instruction. Included basic microbiological tests (TPC, Coliforms, E. Coli, S. Aureus, Salmonella,…) and chemical test (antibiotic).

Pathogen testing is conducted by both internal laboratory and external laboratory which has been accredited ISO 17025.

5.7 Product release

The Product release procedure (PM-TEC-05 rev. 01.2025 date 2025-01-03) was in place. All finished product was checked and confirmed the quality (organoleptic, microbiological, chemical) and analysis results by internal and external lab (if any) were consolidated & confirmed with product specification & customer requirements by competent QA staff. Final release decision was approved by QA Management before shipping order. Check dispatch record for Frozen cooked shrimp ring with sauce lot BAX444, production date 2024-11-14, quantity 4284ctns = 5826.24kgs, shipped to customer C.P.Food date 2024-12-08 on cont/seal MNBU4235780/ML-VN0032325 found satisfaction.

5.8 Pet food and animal feed

No pet food was produced

5.9 Animal primary conversion

No Animal primary conversion

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

6. Process control

6.1 Control of operations

The production operation included temperature-controlled storage of raw materials and finished products.

Company have GMP/ SSOP/HACCP manuals and defined in GMP/SSOP/HACCP Manuals with very detail and record keep as evidence of all process indicators are controlled & followed. QC staffs and operators at CCPs were trained on CCP control with available validation report.

Temperature during processing, côking, IQF process and soaking recipe as well controlled and recorded. Temperature during IQF process of minus 35 to minus 40 degree Celsius and cooked bell 99oC to 100oC was well controlled and recorded. Formula of food additive used was checked and kept record. Glazing rate check regular every hour by trained QC. Validated report for cooking on 2024-11-21~24, soaking on 2024-05-15, and cold storage temperature distribution on 2024-05-29 checked and found compliance.

In the case of equipment failure or deviation of the process from specification, engineering department has applied quarantine procedure. From the beginning of every shift, assigned QC staff will check all working conditions of the production area with record SSOPs while status of packaging materials from previous production and raw material was monitored by both store-keeper and QC staff GMPs. To ensure about correct packaging, company also applied release procedure for all finished production lot. Checked record of production dated 2024-11-14 found satisfaction.

6.2 Labelling and pack control

Detail controls in place to ensure in right packaging and correctly labelled. At the beginning of every shift, assigned QC staffs will check all working conditions of the production area with daily GMP record while status of packaging materials from previous production was monitored by both store-keeper and QC staff by daily inventory record of warehouse. To ensure about correct packaging, company also applied release protocol for all finished production lot. Checked production record on 2024-11-14 found satisfaction

6.3 Quantity, weight, volume and number control

Quantity and weight check is defined in GMP manual, including frequency and methodology of quantity checking. Quantity control system is applied for the whole process in every production lot. Each bag of the product was checked to ensure there was no lower net weight bag than the claimed weight. Each bag of finished product was checked by worker with weigh, count, size, label, appearance. QC was responsible for verification check every hour and checked by the local authority Nafiqad for every lot. Checked production record on 2024-11-14 found satisfaction

6.4 Calibration and control of measuring and monitoring devices

Calibration procedure PM-TEC-11 rev9 date 2025-01-03 is in place an implement.

Calibration plan PL-TEC-01 date 2025-01-02 were available. List of all measuring equipment and tool is available. Calibration plan for internal and external is defined based on risk assessment

Random check the below calibration records yearly (conducted external accredited) found satisfaction:

+ Liquid in glass thermometer (-8 to 100oC) (SN: 3007) CoA 0457.38/NH/0523 date 2023-06-05 valid 5 year

+ Liquid in glass thermometer (-30 to 50oC) (SN: 1972650) CoA 0371.33/NH/0322 date 2022-04-04 valid 5 year

+ Standard weigh (1g to 1000g) (SN: 031TB) CoA 0371.21/KL/0322 date 2024-04-13 valid 3 year

+ Internal calibrate for scale (2 months) and thermometer for CCP (monthly) was checked on 2025-03-02

Calibration was traceable to National standards, with supporting documentation where applicable. Any issues with measuring and monitoring devices could be raised through non-conformance or corrective action systems

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

7. Personnel

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

Training procedure PM-PER-02 rev. 01.2025 date 2025-01-03 was established and implemented, all staff have been checked qualification and trained and experience before working.

Training plan PL-PER-04 date 2025-01-06 was approved by Director included HACCP, TACCP, VACCP, allergen, pest control, CCP, SSOP, GMP, … for all workers with refresh training and new worker training before they work.

+ Training record of HACCP dated 2025-01-13

+ Training record of TACCP dated 2025-02-25

+ Training record of VACCP dated 2025-02-22

+ Training record of CCP dated 2025-02-22

+ Training record of SSOP dated 2025-02-10

+ Training record of GMP dated 2025-02-11

+ Training record of Pest control dated 2025-01-12

+ Training record of Chemical control dated 2025-02-22

+ Training record of Allergen control 2025-02-18

Quiz or test are available for each training to verify the understanding of training

Training records are maintained and state clearly the training content, trainer, trainees and duration

Minor NC/7.1.6: Training records reviewed did not include references to the specific training materials used, which is required to demonstrate the scope and content of the training delivered.

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

Personal hygiene control procedure SSOP 04 rev. 11 date 2025-01-02 was in place and clearly defined the requirement for personal hygiene clearly (not wearing watches, jewellery in production, keeping short nails and un-varnished, no perfume, no personal belongings including medicines be taken into production and hand-washing requirements)

Compliance with Personal hygiene was checked daily at the entrance to the production area by trained QC staff.

Hands washing facilities are provided at the entrance, including warm water, liquid soaps and alcohol for sanitizing and hand-drying by single use towels.

Drugs only provided by the company nurse and staff must use it in the medical room, not allow taking any drug out or keeping in locker room.

Staff with open wound not permits to work in open production area

7.3 Medical screening

Health control procedure PM-PER-04 rev. 11 date 2025-01-03 was in place. Medical screening was checked one a year for all worker.

Medical screening was including physical and stool culture for food contact worker

Last medical screening on 2024-09-10 for all worker not found any case of worker contaminated with pathogen.

New worker must have the health certificate from Government before working. Health questionnaires were completed by visitors and contractors and check before coming to factory as procedures.

Health status checked daily for all worker before entering to production.

Illness reporting requirements were suitably detailed and included procedure for action to be taken in event of employers reporting/suffering from infectious disease.
7.4 Protective clothing: employees or visitors to production areas
Protective clothing control was defined in SSOP 04 rev. 11 date 2025-01-02, including the requirement of protective clothing for production areas, no button, and no external pocket. Different colors and labels are used for identification (pink for HR area, white for LR area). This SSOP was communicated and trained for all staff. Documented instruction about correct PPE & wrong PPE wearing was displayed in the changing room. The PPE was provided to workers every year (2pcs) and when necessary. The blue rubber gloves are used in production and sanitized by chlorine. Protective clothes are 100% laundry on-site by the internal staff. Laundry instructions as water, dosage of detergent was available in laundry room. Clean protective clothing was separated container with dirty PPE, and their put into a closed & clean container with a lip to transfer to the changing room. Swab tests are done to verify the cleanliness of PPE. Testing report 50227VSCN/25 date 2025-03-05 by internal lab (PPE) found satisfaction

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

8. Production risk zones – high risk, high care and ambient high care production risk zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
The risk assessment to define risk level of production areas was reviewed. Factory layout showed enclosed product is packing and storage areas; low risk product area was defined from raw receiving to soaking step; High risk defined as after cooking to primary packing of cooked product, which is showed in red zone. Physical separated by walls, separated changing facilities provided, directly enter to cooling, freezing/glazing & packing rooms.
8.2 Building fabric in high-risk and high-care zones
A map of the drain available and show that the flow from drains shall not present a risk of contamination to the high-risk area Air filter for high risk area were checked & cleaned weekly by engineering. Air flow checked and found OK. Effluent maintained in cleaned condition, correct effluent flow was arranged.
8.3 Equipment and maintenance in high-risk and high-care zones
Toolbox in high-risk product area was maintained in clean condition. Equipment was dedicated, self-containing design was identified easily.
8.4 Staff facilities for high-risk and high-care zones
The correct PPE changing procedure and personnel facilities provided, boots change and handwashing before access to high-risk products area was arranged well.
8.5 Housekeeping and hygiene in the high-risk high-care zones
Cleaning procedure SSOP02 + SSOP03 rev11 date 2025-01-02 and cleaning instruction for each equipment defined the specific cleaning for production equipment & building fabric. Manual cleaning method by production staff, clear responsibilities defined. The cleaning chemical is liquid soap & disinfecting with chlorine solution & final rinsed with potable water on begin of production.

There was at least 1 cleaning worker for each area to cleaning remain in floor, all equipment after used will be collected to cleaning tools area and cleaned. The ceiling was cleaned every shift. All cleaning tools were clear indicated and segregate to each function (use to ceiling, wall, floor, equipment, tools).

Frequency: 0.5h/time for gloves worker, each used time for production tools, daily for wall/floor, weekly for ceiling.

Daily hygiene check is done. QC is responsible for checking cleaning and hygiene conditions in whole processing with full SSOP and GMP daily records. Checked record on Jan 2025 found satisfaction. The hygiene condition was in good condition during the site tour audit.

Environmental monitoring programme was done by microbiological swabbing plan (PL-LAB-04/F2 date 2025-01-02) which is based on risk assessment (F-DGRR-06 date 2024-01-04) according to using a Zones 1-4 approach. All area in production (food contact and non food contact surfaces were random and rotating tested microbiological (TPC (<10/100cm2), Coliforms (-), E.coli (-), Sta.spp (<10/100cm2), S.aureus (<10/100cm2), V.cholera (-), V.parahaemolyticus (-),V.vulnificus (-), Salmonella (-), Listeria monocytogenes (-)) by internal lab weekly and verification by external lab every 6 months.

- Testing report no 50225VSCN/25 date 2025-03-03 by internal lab (hands worker, PE, conveyor, basket, table, boots, floor, wall, ceiling, air,…) found satisfaction

- Testing report no 50218VSCN/25 date 2025-02-28 by internal lab (hands worker, glazing machine, material tank, drained line, air,…) found satisfaction

- Testing report 50227VSCN/25 date 2025-03-05 by internal lab (PPE) found satisfaction

- Verification testing report no 111408VL date 2024-11-18 by nafi6/1.1669 found satisfaction

- Trend analysis report for Environmental monitoring programme was done every 3 months, the report on 2025-01-02 was checked.

8.6 Waste/Waste disposal in high risk, high care zones

Dedicated waste containers were identified and maintained in clean. Shrimp shell from peeling step was transferred to external by dedicated window to an enclosed room. No facilities transferred, only waste was removed.

8.7 Protective clothing in the high-risk high-care zones

Protective clothing control was defined in SSOP 04 rev. 11 date 2025-01-02, including the requirement of protective clothing for production areas, no button, and no external pocket. Different colors and labels are used for identification (pink for HR area, white for LR area). This SSOP was communicated and trained for all staff. Documented instruction about correct PPE & wrong PPE wearing was displayed in the changing room.

The PPE was provided to workers every year (2pcs) and when necessary.

The blue rubber gloves are used in production and sanitized by chlorine.

Protective clothes are 100% laundry on-site by the internal staff. Laundry instructions as water, dosage of detergent was available in laundry room. Clean protective clothing was separated container with dirty PPE, and their put into a closed & clean container with a lip to transfer to the changing room.

Swab tests are done to verify the cleanliness of PPE. Testing report 50227VSCN/25 date 2025-03-05 by internal lab (PPE) found satisfaction

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

9. Requirements for traded products
9.1 The food safety plan - HACCP
Not applicable
9.2 Approval and performance monitoring of manufacturers/packers of traded food products
Not applicable
9.3 Specifications
Not applicable
9.4 Product inspection and laboratory testing
Not applicable

9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

Module 11: Meat Supply Chain Assurance
11.1 Traceability
11.2 Approval of meat supply chain
11.3 Raw material receipt and inspection
11.4 Management of cross-contamination between species
11.5 Product testing
11.6 Training

Module 13: Meeting FSMA Requirements for Food – July 2022
Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)
Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)
Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)
Sanitary Transportation: 21 CFR Part 1 Subpart 0 (Clauses 13.4.1 – 13.4.9)
Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

14.1 Additional Specifier Requirements
14.1 Traceability
14.2 Environmental Monitoring
14.3 Product inspection and laboratory testing
14.4 Protective clothing: Employees or visitors to production areas