



QUALITY AND FOOD SAFETY POLICY

INSIDE • OUT

QUALITY POLICY STATEMENT

Inside Out Nutritious Goods is committed to a Quality & Food Safety Management System as documented in the organisation's Policy, Food Safety and Quality Manuals under SQF V9.0 and the regulatory requirements under the Food Act 2003, Food Regulation 2010, FSANZ Food Standards Code and the NSW Food Authority requirements for beverage processing under the Act.

It will be ensured that management and staff at Inside Out Nutritious Goods, are adequately trained in the Quality & Food Safety Management Systems to competently execute their responsibilities.

Inside Out Nutritious Goods will strive for excellence in meeting regulatory, statutory and customer requirements, and commit to meet certain objectives, including complete customer satisfaction; expansion of trade and maintaining safe and quality environment for our products and employees. This will be achieved by continually improving quality and food safety management systems.

In general, a healthy and safe working environment will be provided to all staff by providing compliant structure and equipment to facilitate their work, safety environment.

Improvements to quality management system will be brought by management review meetings based on customer feedback; communication with approved suppliers; internal and external audit reports; structural and equipment improvement; introduced new lines of product and, provision of training and on-the-job experience to ensure a high competence level of staff.

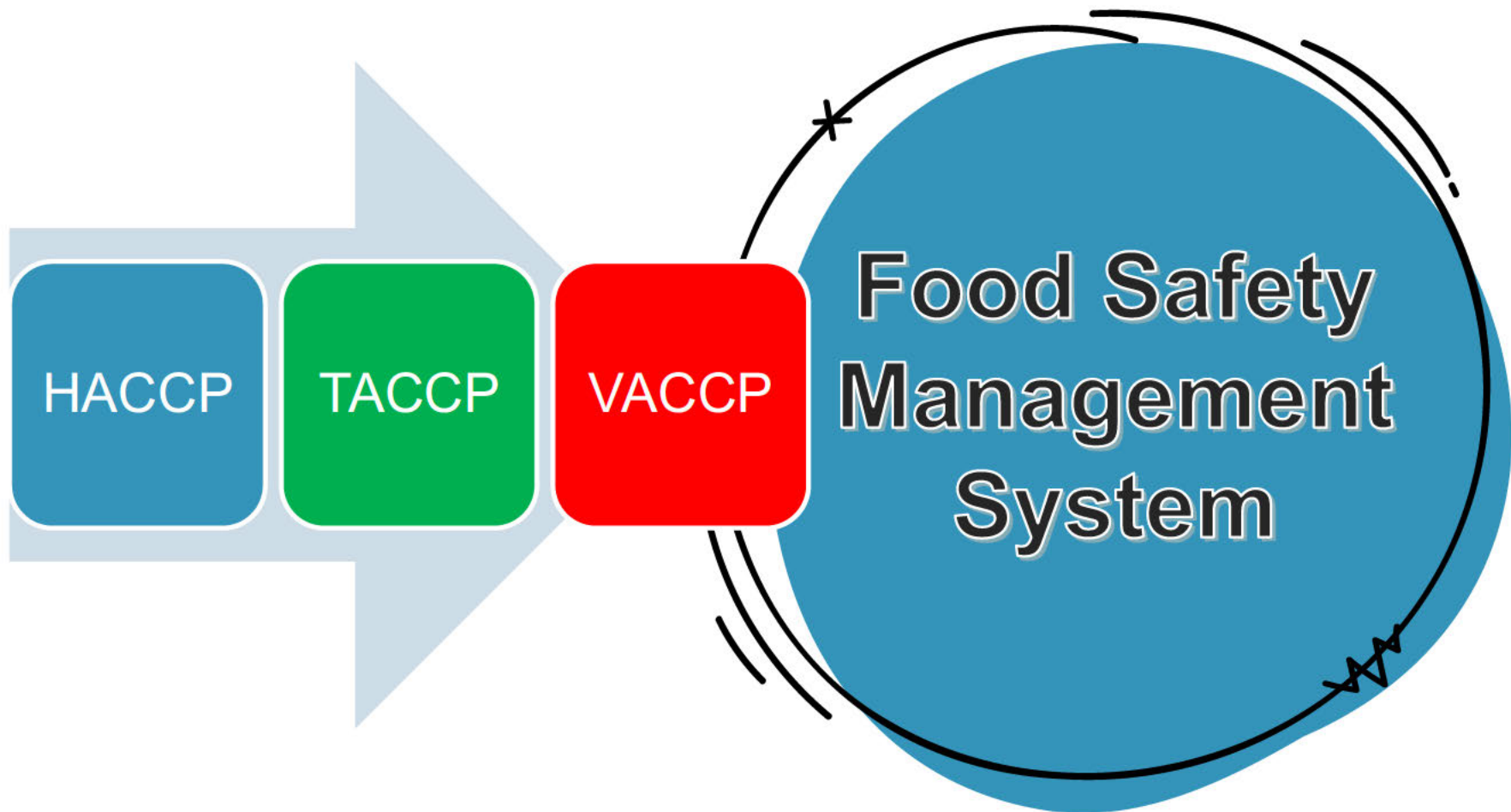
This policy is displayed so all employees and our customers know and understand our organisation's Policy and because our Quality Manual is a living document, this Quality Policy is subject to constant management review.



FOOD SAFETY

refers to handling, preparing and storing food in a way to best reduce the risk of individuals becoming sick from foodborne illnesses





WHAT IS HACCP?

Hazard Analysis and Critical Control Point

A system which identifies, evaluates, and controls hazards which are significant for food safety.

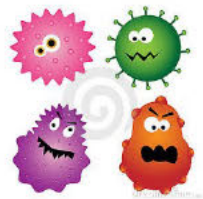


WHAT ARE THE HAZARDS IN OUR FOOD?

Biological

bacteria, viruses, parasites

Sources: skin, nails, sores, clothing, ingredients, water, pests



Chemical

compounds that can cause illness or injury due to exposure

Sources: cleaning agents, sanitizers, pesticides, antibiotics



Physical

foreign objects that can cause harm to product

Sources: hair, jewellery, rocks, metal, food, pests, nail polish, false eyelashes



Allergen

tree nuts, gluten, fish, soy, dairy, egg, shellfish, peanut, lupin, sulphites

Sources: ingredients, food, surfaces



FOOD SAFETY AND HACCP

THE PURPOSE OF HACCP IS TO HELP ENSURE THE PRODUCTION OF SAFE FOOD

IT IS BASED ON PREVENTION RATHER THAN DETECTION OF HAZARDS



HEART OF HACCP

CRITICAL CONTROL POINTS (CCP)

Step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level

- ✓ CCP 1 – Refrigerated storage
- ✓ CCP 2 – Heat Pasteurisation
- ✓ CCP 3 – Packaging Sanitation
- ✓ CCP 4 – Labelling



HEART OF HACCP

CCP 1 – Refrigerated Storage

Potential Hazard: Survival of harmful bacteria that could lead to serious illness or death

Source: Incorrect storage above 5°C

Control Measures: Calibration, Temperature logging, label review and operational checks

Critical Limit: Cold storage below 5°C at any duration, or
Between 5 and 60 °C for a cumulative of 2 hours, and
NOT above 5°C for more than cumulative of 2 hours.



HEART OF HACCP

CCP 2 – Heat Pasteurization

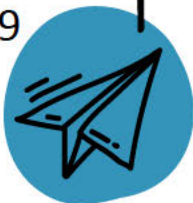
Potential Hazard: Survival of harmful bacteria that could lead to serious illness or death

Source: Pasteurization temperature not reached

Control Measures: Calibration, Temperature and Flow rate monitoring

Critical Limit: Temperature: min 108 °C

Flow rate: max of 2150 liters/hour (equivalent to minimum 6.99 seconds)



HEART OF HACCP

CCP 3 – Packaging Sanitation

Potential Hazard: Survival of harmful bacteria that could lead to serious illness or death

Source: 1. Insufficient chemicals used for the chemical dosing
2. Blocked bottle and cap rinse nozzle

Control Measures: Calibration, Hourly Chemical Concentration Monitoring

Critical Limit: PAA concentration (700 ppm – 1100 ppm)

Supply pump pressure (0.35 - 0.5 MPa)

Rinse nozzles are not blocked



HEART OF HACCP

CCP 4 – Labelling (Bottle Sleeving)

Potential Hazard: Survival or **Salmonella spp., E. coli, Listeria monocytogenes, Bacillus cereus, Clostridium botulinum**, yeast and mould

Source: Incorrect storage and handling instruction on the label

Control Measures: Label content checks, line clearance checks

Critical Limit: Label contains correct storage and handling

instruction - **“Keep refrigerated below at or below 4°C at all times.”**

HEART OF HACCP

✓ **Corrective actions must be taken if parameter results are not within the critical limits. Unacceptable conditions include:**

- X Cold storage temperature readings above 5°C.
- X If PAA concentration is below 700 ppm
- X If UHT temperature goes below 108 °C and/or Flow rate exceeds 2150 Lph

✓ **Any product produced under unacceptable conditions must be identified, isolated and put on **HOLD**.**

- X QA will determine disposition of product based on investigation findings



HACCP AND GMP

HACCP is the program that is used in the food industry for FOOD SAFETY, not food quality.

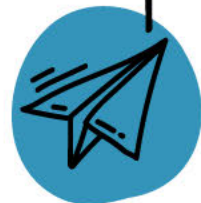
HACCP cannot work if GMPs and good sanitation programs are not already in place.





GOOD MANUFACTURING PRACTICES (GMP)

GMPs are those activities and practices that we do to prevent hazards or contamination from entering food products.





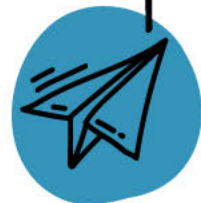
WHAT'S WRONG WITH THIS PICTURE?

GOOD MANUFACTURING PRACTICES (GMP)

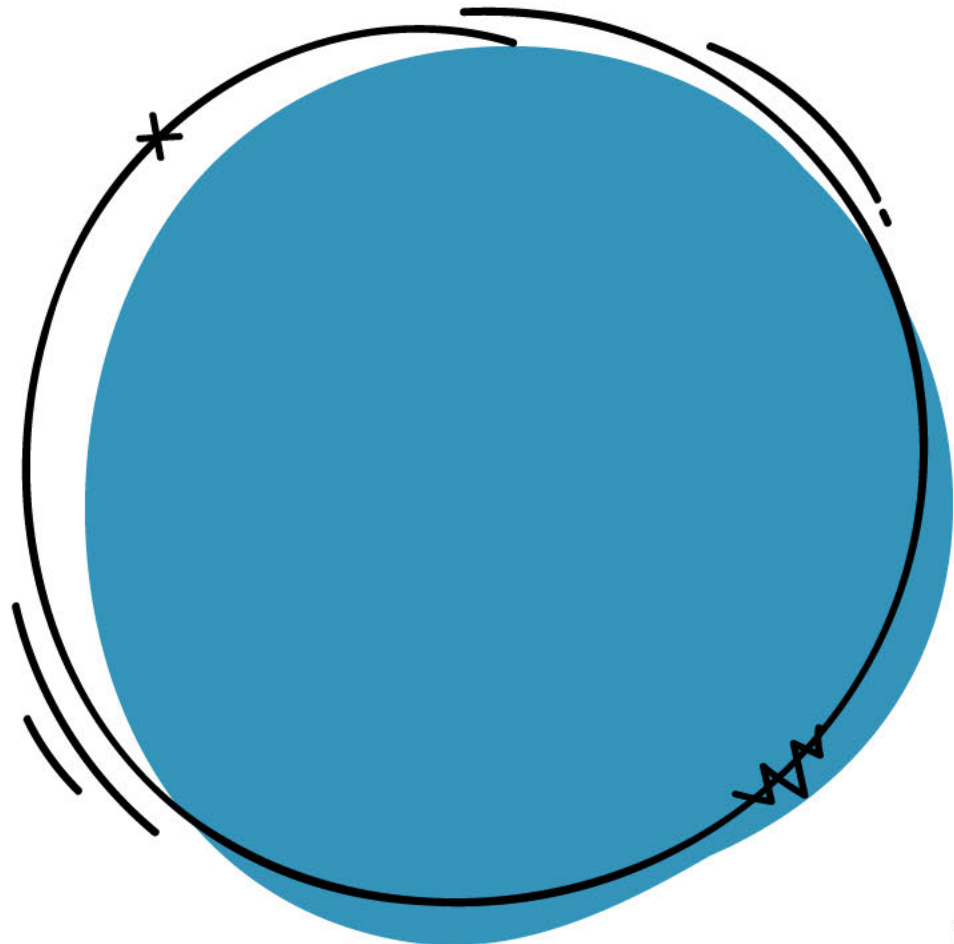
- ✓ People
- ✓ Premises and equipment
- ✓ Process
- ✓ Products and materials
- ✓ Procedures (or Paperwork)



5Ps of GMP



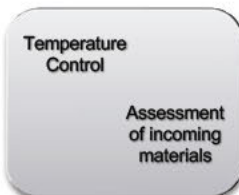
HOW DO WE
PREVENT
CONTAMINATION?





SELECT HARVESTS

Supplier Control



Receiving,
Storage and
Delivery



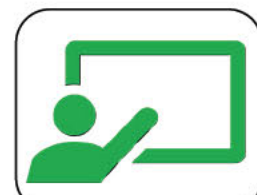
Personal Hygiene



Cleaning and
Sanitation



Correct entry and
exit procedures



Training



Chemical Control



Production
Equipment



Production



Allergen Control



Visitor & Contractor
Control



Pest Control



COVID-19 information and advice

AREAS OF GMP



PERSONAL HEALTH

- Ensure that a clean bandage covers any open wounds
- If you have a cold, flu or shows symptoms of a food-borne illness – usually indicated by fever, nausea, vomiting or diarrhoea
 - ✓ Report to your supervisor as soon as possible.
 - ✓ Do not engage in any handling of food where it is likely to contaminate the product.
 - ✓ If continuing to engage in other work on the food premises, ensure all measures are taken to prevent contamination
 - ✓ Staff are advised to stay home until clearance is received from the doctor



PERSONNEL HYGIENE AND PRACTICE

- ✓ Shower daily
- ✓ Eat only at designated areas
- ✓ No perfume, aftershave, fragrant creams
- ✗ Not sneeze, cough or blow your nose over food or food contact surface. Use face mask in production area.
- ✗ Not spit, smoke or use tobacco or similar anywhere within the facility
- ✗ Not carry objects above the belt or waistline (ex. pens, flashlights, etc)
- ✗ Not leave gloves, masks, etc. lying around while on break or at shift end



What are the requirements?

- ✓ Personal clothes in good and clean condition
- ✓ Hair fully covered underneath the hair net – covering the ears
- ✓ No fashion rips, frills, fur, tares, sequins as part of your clothes
- ✓ No caps
- ✓ Fake eyelash – including extensions
- ✓ No jewellery including visible piercings
- ✓ Trimmed nails and no painted or fake nails

PERSONAL CLOTHING AND PPE



When to wash your hands?

- ✓ Upon entry / re-entry to processing (production and filling area)
- ✓ After visiting the toilet
- ✓ After handling something on the floor
- ✓ After handling rubbish and any other time when hands may have become contaminated
- ✓ After handling chemicals

HAND WASHING



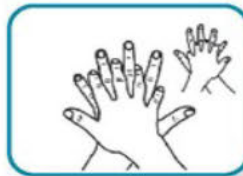
Wet hands with water



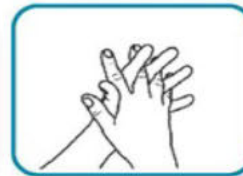
apply enough soap to all hand surfaces



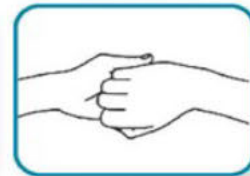
rub hands palm to palm



right palm over left dorsum with interlaced fingers and vice versa



palm to palm with fingers interlaced



backs of fingers to opposing palms with fingers interlocked



rotational rubbing of left thumb clasped in right palm and vice versa



rotational rubbing, backwards and forwards with clasped fingers of right hand in palm and vice versa



rinse hands with water



dry thoroughly with single use towel

Sanitise and your hands are now clean.

PREMISES AND EQUIPMENT

Keep unscreened doors and windows closed, including roll up doors.

Report any pests or evidence of pests such as flies, insects, droppings

| PEST SIGHTINGS LOG | | | | | | | | |
|--------------------|------|-------------------|--------------|-----------------|----------|----------------------------------|--------------|-----------|
| DATE | TIME | NAME OF INITIATOR | PEST SIGHTED | # OF PESTS SEEN | LOCATION | ACKNOWLEDGEMENT OF PEST SIGHTING | | |
| | | | | | | DATE | ACTION TAKEN | SIGNATURE |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Ensure that all containers, including those holding rework, are properly labelled and are kept covered

HOUSEKEEPING

Food Standards Code minimum criteria of cleaning:

- Visually clean
- Without odour

Clean-as-you-go

- Clean up after yourself
- Keep your work area tidy
- Place wastes into the bin immediately

Use of tools and water hose

- All items used for equipment and food contact surfaces are kept off the floor at all times.
- Water hoses are used for cleaning food contact surfaces – never place it on the floor

HOUSEKEEPING

Foreign objects that can contaminate food:

- X Unapproved items such as own pens
- X Keys, mobile phones, music players, earbuds, buttons
- X Glass, clear brittle plastic, ceramics, wood
- X Staples, paperclips, not permitted within warehouse / production area
- X Hair / facial hair, false nails, false eyelashes, facial rings and other jewelry.

Chemical contamination:

- X Improper use of chemical
- X Unlabeled chemical container
- X Using of "chemical only" container to handle food / ingredients
- X Not changing gloves after chemical handling

HOUSEKEEPING

Colour coding rules

- ✓ Each area having their own colour for cleaning tools

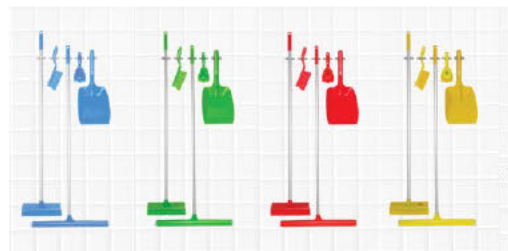
Yellow = Food contact surfaces

Blue = Production Room (non-food contact)

Orange = Allergen

Green = Filling Room

Red = Warehouse



- ✓ All stainless steel and yellow buckets are for direct food contact
- ✓ All other buckets are for waste, cleaning, and other use only

HOUSEKEEPING

Put things away after use:

- Ingredients and packaging
- Water hose
- Tools placed back into the toolbox, and workshop
- All cleaning tools to be cleaned and stored away correctly after use

Use of Inside Out branded bottles

- Don't use the bottles for anything else other than its intended use

Filled bottle waste

- Filled bottles must not be placed directly into the bin
- Must be emptied & crashed, before throwing them into the general waste bin

HOUSEKEEPING

Supplier contaminated bottles - visually dirty bottles, dirty tier pads

- Stop using and inform management immediately
- Pallet to be checked and return to supplier

Unintentionally contaminated bottles – dropped bottles

- Crush the bottles by stepping on it to prevent misuse
- Throw them in the bin

External doors – Roller shutter, entrance to warehouse, entrance to the office

- All doors must be kept closed at all times when not in immediate use

HOUSEKEEPING

Wooden pallets

- No wooden pallets to be use inside production at ANY time
- Wooden pallets can be use when packing products
- Don't use damaged pallets – loose boards, protruding nails, mouldy, visually dirty

Cleaning Materials

- Must be cleaned and hanged to dry when not in immediate use

Mop and mop buckets

- Must be emptied and washed after each use

CLEANING AND SANITATION

- ✓ Cleaning is the chemical or physical process of removing dirt or soil from surfaces.
- ✓ Sanitizing is the process that results in reduction/destruction of microbes.

Production equipment/utensils must be thoroughly cleaned and sanitized after use

PRODUCT



Keep hand contact with ingredients and packaging material to a minimum

Check ingredients for UBD or BBD to ensure that fresh ingredients are used

ALLERGENS

- ✓ Inside Out works with **7** allergen – **Almonds, Gluten** (from **Oats**), **Soy, Hazelnut, Pistachio, Cashew** and **Fish** (from Marine Collagen)
- ✓ People with peanut allergen has a higher risk of anaphylaxis compared to other food allergen
- ✓ Anaphylaxis = severe allergic reaction that can be life threatening.
- ✓ There is no cure to allergens
- ✓ Best practice to segregate or do not use high risk allergen

ALLERGEN
LABELLING
SAVES LIVES



FISH



WHEAT



MILK



TREE NUTS



PEANUTS



SHELLFISH

Know the ten
allergens that
have to be on
food labels

Read more about mandatory
allergen labelling
[www.foodstandards.gov.au/
allergenlabelling](http://www.foodstandards.gov.au/allergenlabelling)



LUPINS



SOY



EGGS



SESAME
SEEDS

ALLERGENS

Symptoms of Food Allergy

- ✓ Hives
- ✓ Swelling of the lips, faces, eyes
- ✓ Swelling of the tongue
- ✓ Breathing difficulty
- ✓ Stomach pain
- ✓ Vomiting

**ALLERGEN
LABELLING
SAVES LIVES**



FISH



WHEAT



MILK



TREE NUTS



PEANUTS



SHELLFISH

**Know the ten
allergens that
have to be on
food labels**

Read more about mandatory
allergen labelling
[www.foodstandards.gov.au/
allergenlabelling](http://www.foodstandards.gov.au/allergenlabelling)



LUPINS



SOY



EGGS



SESAME
SEEDS

NO PEANUT POLICY

- Be mindful that the food you often eat may contain peanuts.
- Don't bring any food containing peanuts into the facility.
- If you're unsure whether the food contain peanuts, it's best not to bring it in.

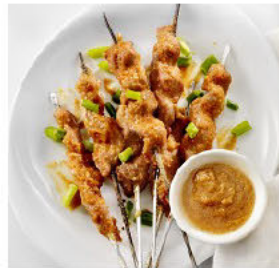


EXAMPLES OF FOOD CONTAINING PEANUTS

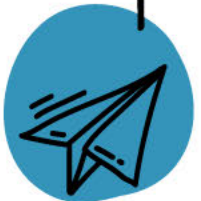
s 22



s 22



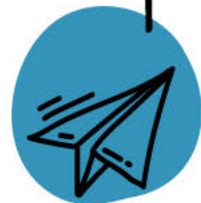
s 22



HOW TO DEAL WITH ALLERGENS



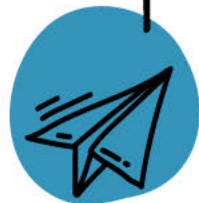
Read and Separate!



HOW TO DEAL WITH ALLERGENS

Incoming goods and warehouse

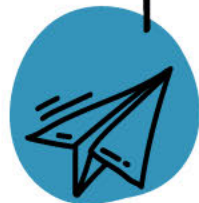
- Audit supplier and supply chain
- Confirm supplier specifications & certificates
- Assure correct storage and ingredient separation
- Have complete raw material and product specifications



HOW TO DEAL WITH ALLERGENS

Processing and Packaging

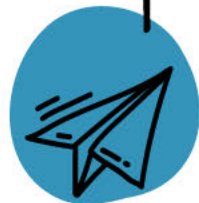
- Plan and schedule production
- Try to use dedicated production lines
- Proper cleaning and sanitation of production equipment
- Appropriate design of facilities, equipment and tools
- Accurate labeling of equipment, tools, intermediates, etc.
- Procedures for using rework (internal returns)
- Clean tools
- Detect cross contamination



HOW TO DEAL WITH ALLERGENS

Finished Product and Warehouse

- Verify correct labelling
- Correct packaging
- Correct product separation
- Auditing and enforcement



ALLERGEN SPILL CLEAN-UP

1. Stop production and movement in the area.
2. Obtain clean-up equipment (i.e. broom, dust pan, spill bin)
3. Sweep contaminated area. Dispose of the contaminated waste.
4. Mop / Wash contaminated area.
5. Inform Supervisor or lead hand to verify the effectiveness of the allergen spill clean-up activities.
6. Clean clean-up equipment before putting back to storage.

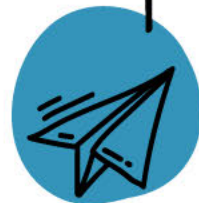
HOW TO DEAL WITH ALLERGENS

Product Development and Design

- Consumer group?
- Specific needs? *e.g. gluten free*
- Naturally free or specifically processed
- Selection of ingredients – *cross contamination*
- Production process – *shared equipment?*
- Correct labelling



Label it!



WHO IS
RESPONSIBLE FOR
FOOD SAFETY AND
GMP?



FOOD SAFETY MANAGEMENT PART II



TACCP (FOOD DEFENSE)

1. Threat Assessment & Critical Control Points
2. Focus on Food Defense
3. Address Threats in food business
4. Designed to prevent International adulteration of food
5. Can be behaviourally or ideologically motivated
6. Adopted by Global Food Safety Initiative (GFSI)
7. Require a control plan including mitigation strategies and correction procedures

VACCP (FOOD FRAUD)

1. Vulnerability Assessment and Critical Control Points
2. Focus on Food Fraud
3. Address Vulnerabilities for a food business due to food fraud
4. Designed to prevent International adulteration of food
5. Can be economically motivated
6. Adopted by Global Food Safety Initiative (GFSI)
7. Require a control plan including mitigation strategies and correction procedures

TACCP - 3 CATEGORIES OF THREATS TO SECURITY

- X Natural threats (earthquakes, hurricane, drought, etc.)
- X Physical security threats (fire, flooding, power outages damaging equipment)
- X Human threats (cybercrime, insiders, terrorism)

VACCP - FOOD FRAUD

“A collective, **tampering** or term encompassing the **deliberate** and **intentional substitution, addition, misrepresentation** of food, food ingredients or food packaging, labelling, product information or false or misleading statements made about a product for economic gain that could impact consumer health.”

s 22

Food Fraud Vulnerability = Opportunity + Motivation - Controls

FOOD FRAUD



Substitution – *Banana flavour instead of Banana Purée;
Chocolate flavour instead of Organic Cacao*

Concealment – *Harmful colourings added to conceal defects*

Mislabelling – *Miscoding / Expiry / Unsafe Origin;*

ex: Labeling as pure honey but contents are made from sugar syrup

Dilution – *watered down product using unsafe water*

Counterfeiting – *replicas of other popular food products; not produced with
acceptable safety assurance*

Unapproved Enhancement – *Adding melamine to enhance protein content*

Grey Market Production/ Theft / Diversion – *sale of excess unreported
product*

VACCP - Common examples of Food Fraud

FOOD DEFENSE VS FOOD SAFETY VS FOOD SECURITY

Food Defence - the protection of food products from contamination or adulteration intended to cause public health harm or economic disruption

Food Safety - the protection of food products from unintentional contamination

Food Security - when all people, at all times, have both physical, social, and economic access to sufficient, safe, and nutritious food.

Preparedness is key in order to:

- ✓ Prevent
- ✓ Protect against
- ✓ Mitigate
- ✓ Respond to
- ✓ Recover from

THREATS & HAZARDS of
greatest risk to the food
supply.



Food Defense vs Food Safety vs Food Security

THANKS!

Any questions?

