



FOOD DEFENSE PROGRAM

A multi-disciplinary team, headed by the Security group, is formed to create a Food Defense Program. It aims to do vulnerability and risk assessment on all points during the manufacture of each product. The team uses the CARVER+Shock method, which is an offensive targeting prioritization tool. Mitigation measures are then recommended selected and defined by the team as recommendation for implementation by the Management. This will then become the basis in creating a Food Defense Plan.

PRODUCT RECALL POLICY

PHILPACK Management has the prime responsibility for implementing food recalls or withdrawals. The Recall/Withdrawal Team, headed by Corp. QA Director, is responsible for investigating and evaluating any products suspected of being adulterated or misbranded and for conducting a hazard evaluation of such suspected products. It is also their responsibility to closely examine distribution records of the product in question in order to determine whether a trade or consumer level recall is required; and to coordinate all aspects of a product recall, ensuring that all procedures are carried out thoroughly and effectively.

The procedure covers all products manufactured and distributed by PHILPACK that may have been the subject of product recall. The Committee and designated Supply Chain/ Trade Key Contact Persons are responsible in coordinating all related activities.

The procedure starts with the notification of concerned individuals, assessment of the need of a recall, gathering of information, investigation and evaluation of product defect, decision phase, stopping further distribution and sale of the product involved, informing relevant authorities then the recall proper.

MOCK TRACEABILITY AND RECALL EXERCISE

A Mock Traceability and Recall Exercise is conducted at least once a year. This includes the tracing of all CCP and manufacturing record, shipping/ distribution records and a full reconciliation of quantities received, manufactured, stored and shipped. The exercise may start with an information on the incoming material (e.g. certain lot of ingredient or delivery date of a material) or of a finished product (e.g. a certain batch or lot of product).

A complete (100%) traceability/ identification of production lot to ingredients as well as to distribution should be done within two (2) hours and not to exceed 24 hours, i.e., all information and reports must be assembled within that timeframe. The exercise will be considered "Failure" if traceability is not attained within 24 hours or recovery is >105% or <95%.



THE TRACEABILITY SYSTEM

PHILPACK adopts a manual based warehouse control system with the integration of SAP System to trace the product forward and backward using the finished product variety code and production date code.

1. The Coding System:

Each finished product container is marked with product variety code and production date code in ABBYY format where A is the last digit of the year, BBB is the day of the year numbered consecutively from 001 for Jan. 1 until 365 for Dec. 31, or 366 for leap year, YY is plant code. Batch code, time or period code is also printed on the primary packaging.

Secondary packaging, i.e. cartons & trays, shall be marked with product tracing information and/ or markings required by the market/ buyer. Case Codes must be accurate, in agreement with the markings on the primary packaging, legible and should not be printed over case graphics.

2. Forward Traceability:

A pre-numbered pallet tag shall be placed on the pallet as it is completed. The pallet tag shall contain a unique Tag Number, product variety code or ship ID, production date and code and quantity per pallet. Recorded information on the tag shall also be indicated in the Daily Pack Recall Control (F-GCI-008). This document can then be used to verify pack counts and pallet tag usage. These are also encoded in the active database systems.

The triplicate copy of Finished Tag is detached during loading of items in the carrier van, attached and recorded in Container Load Plan (CLP). The completed CLP is the basis for the generation of NOS (Notice of Shipment) and Bill of Lading. These records contain the information from contained in the tag as well as pertinent shipment details. These are also encoded in the active database systems.

3. Backward Traceability:

Each finished product container individually marked with product code and production date code is traced through SAP, Daily Production Logsheet and Daily Pack Recall Record where information on product description, variety, production date/period, tag numbers, and inventory status (i.e. produced, shipped, on hand, on hold) are indicated at its corresponding product and production code per pallet tag number.



ALLERGEN CONTROL PROGRAM

At the minimum, the following measures are taken by PHILPACK to prevent cross contamination or mislabeling of non-allergen items:

- Control of ingredients from suppliers (through review of supplier's Allergen Status)
- Review of new ingredients for potential allergens
- Proper storage and labeling of allergen ingredients and allergen containers
- Inspection of equipment before production run to ensure adequacy of cleanup
- Scheduling of production runs of allergen-containing products
- Formulation control
- Compliance to proper rework procedure
- Equipment and system-design considerations
- Audit on personnel practices in handling allergens and allergen- containing products
- Allergen Training of employees
- Compliance to Food Allergen Labeling Guidelines in preparing labels
- Effective management of label inventories

FOREIGN MATTER CONTROL

PHILPACK provide guidelines on controlling foreign material contamination in raw and processed products, such as wire, metal, glass, stones, plastic and wood by nature could cause severe injury to the consumer's teeth and gums, they can become lodged in the throat causing choking or they can penetrate the soft tissue of the esophagus resulting to infection.

Production maintains documented procedures on self-inspection and train their personnel on GMP. Masterlists of glass & hard plastic materials are maintained and being accounted by Production and audited by QA. Other foreign materials such as metal are also accounted and inspected at regular frequency.

There shall be no glass at the food processing areas except for the primary packaging, MIG (temperature, pressure gauges, temperature recorder cover) and sight glass on tanks, evaporator tanks, syrup tanks, decanters and other equipment. Where glass is present, a glass register must be maintained and monitoring system must be established to check for glass condition. Light bulbs or other glass suspended over the product at any stage of preparation must be of safety type, or otherwise protected to prevent contamination in case of breakage. This can be accomplished by providing a protective shield of suitable non-shattering material.

No-Wood, No-Jewelry, No-Eating policies are also maintained within the production area.

Other foreign objects such as paper, hair, or soft plastics do not pose a significant hazard: However, all effort must be taken to keep them from entering food products as they are certainly not desirable for consumers.



All plant equipment and utensils shall be so designed and made of such material and workmanship as to prevent contamination and adulteration in food.

Any biological or chemical agent, foreign matter, or other substance not intentionally added to food shall be controlled and monitored so as not to compromise food safety resulting to food contamination. This is addressed by the prerequisite programs and food safety / HACCP system.

SANITATION CONTROL PROGRAM

The plant maintains a Master Sanitation Schedule containing responsibility for cleaning and verification, items/ areas to be cleaned, all applicable and appropriate clean up procedures, cleaning materials to be used and corresponding frequencies. This will serve as guide in ensuring that the activity is being carried out properly. An outsourced Service Provider carries out all clean-up activities outlined in the master sanitation schedule and ensures that the clean up activity could not contaminate food contact surfaces and may become possible source of contamination in food.

CIP systems are in place for closed systems and effective. CIP parameters (time, temperature, concentration, flow rate) are established, documented and complied with.

Process Owners shall oversee outsourced clean up service provider during clean up activity, while QA does the audit. A documented pre-operational inspection is in place, i.e. visual, microbiological swabs, ATP testing, etc.

The Sanitation Control Program of PHILPACK also includes approval and control of cleaners and sanitizers used in the plant, as well as control of cleaning apparatus. Brushes and cleaning utensils are suitably identified (i.e. color coding) to ensure that they are only used for their intended purpose.

CONTROL OF NON- CONFORMING PRODUCTS

All non-conforming products, including those products affected by equipment/ instrument that are determined to be out-of-calibration or equipment/ instrument that gave erroneous readings, shall be identified, segregated and controlled to prevent inadvertent shipment. Products that are identified as non-compliant to agreed customer specifications/ requirements but still meet PHILPACK standards on product quality and safety shall not be shipped to the customer, unless, customer's approval has been sought. Any deviation or change to customer specifications shall have their written approval, prior to shipment.

PHILPACK's Hold and Release Control System ensures that raw materials, packaging materials, in-process materials and finished products that do not conform to specified requirements or that await test results and verification shall be controlled to prevent inadvertent use and delivery. Basic Policy includes identification (use of Hold tags), segregation (separate warehouse location) and control to prevent inadvertent shipment, plus the controls thru SAP-QM system.



PACKAGING & LABELLING CONTROL PROGRAM

Aseptic Pineapple Juice Concentrate in drum only bears a printed tag containing the minimum required labelling information. To ensure that the items shipped are the correct items, PHILPACK establishes a guideline for the process of stocks pull-out. An Advanced List is being generated outlining the items to pull out from the Storage for shipment preparation. It contains information on the results of analysis, destination, market, PO number, instructions for marking, and the shipments schedule. Stocks are then pulled out and inspected. Tags are then being prepared and attached to the container, bearing the Drum/ Bin #, Product Variety (Brix/ Identity), Ship ID, Production Daymark, Production Date and Expiry Date. Other information required by the customer are also being included in the tag.

SHIPPING & STORAGE PROGRAM

PHILPACK ensures that products are being stored under conditions required to maintain preservation and meet the declared shelf life. Aseptic Pineapple Juice Concentrates are stored in chillrooms with temperature below 60°F while awaiting shipment schedule. Storage Areas are kept clean and being audited periodically for compliance to Good Warehousing Practices.

Shipment preparation includes checking of items for its container condition, pallet condition (if to be shipped as palletized) and any signs of abnormalities. Drum lock seals/ tamper-evident seals are attached on each prepared drums and recorded. Corresponding Certificate of Analysis is also prepared for all items stuffed for shipping. Shipment is being done by accredited shipping lines.

CORRECTIVE, PREVENTIVE AND IMPROVEMENT ACTION REQUESTS

The company follows the ISO9001:2008 standard in implementing the corrective and preventive actions. CPIARs (Corrective, Preventive and Improvement Action Requests) are utilized to secure the commitment of departments responsible for the root cause analysis and the required corrective actions. These are then analyzed for acceptability then verified after the target completion/ implementation date of the action.



PEST CONTROL PROGRAM

The company has a documented pest control program, managed by trained plant personnel. The program includes (1) Prevention through sanitation and facility protection; (2) Detection; and (3) Eradication.

Pest control activities are performed by an outsourced certified pest control operators. This includes termite control, rodent control, cat control, lizard control, bird control and insect control. Location map for these bait stations is maintained current and available. Fogging and spraying is done weekly, while random inspection of traps is done daily.

The pesticides approved for use in and around PHILPACK facilities are among the recommended pesticides from Fertilizers and Pesticides Authority (FPA) to be used for intended purpose. Use of all insecticides, fungicides or rodenticides are in accordance with current laws and regulations. Applicators must read the label prior to application and strictly follow all directions.

Signed by:

A handwritten signature in blue ink, appearing to read "Edna".

Edna S. Buscato

Manager, Quality Assurance