

OWN BRANDS VENDOR QUALITY	APPROVAL V.P. of Food Safety & Quality Assurance Jerry Noland	November 29, 20 SUPERSEDES December 6, 201	
REQUIREMENTS	APPROVAL Director, QA, Retail & Own Brands Marlowe Dias		
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ALL VENDORS OF ALBERTSONS COMPANIES OWN BRANDS ITEMS	8020_9000	1	9

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CHANGE LOG:

DATE	SECTION	CHANGE	REASON	CHANGED BY
4/21/15	ALL	Implementation of Own Brands Requirements	Combined company	Marlowe Dias
9/9/15	ALL	To reflect company name change to Albertsons Companies	Change in company name	Marlowe Dias
11/17/16	9	Included new document on Shrimp Testing	Provide further guidance	Marlowe Dias
7/18/17	2A	Clarified minimum audit requirement	Clarification	Marlowe Dias
12/6/17	9	Added link to SOP 8020.1850	Provide additional guidance	Marlowe Dias
11/29/18	7A, 7B, and Appendix A	Updated links to SpecConnect	Change in URL	Brad Olson



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1 GENERAL REQUIREMENTS AND EXPECTATIONS

Vendors are required to comply with all regulations applicable to their product and operations as well as additional requirements outlined in this document. Failure to comply with these requirements can result in penalties up to and including termination of approved Vendor status.

Vendors may not sub-contract the manufacture of Albertsons Companies products without prior written approval from Own Brands Food Safety Quality Assurance (FSQA).

Each Vendor is required to have a Quality System documented and implemented. Corresponding documents and records relating to product produced for Own Brands are to be maintained for one year past the shelf-life of dated products, unless otherwise specified, and must be made available to Own Brands FSQA upon request.

All Food, Non-Food and Food Contact Material production facilities must have documented Good Manufacturing Practices (cGMP's) and Pest Control Programs.

2 MINIMUM AUDIT REQUIREMENTS

To be considered as a potential Vendor for Own Brands, the following minimum annual audit requirements must first be met. For detailed requirements refer to *Quality Assurance Audit & Vendor Program Requirements - Vendor Copy*.

A. Minimum Third-Party Audit Requirements by Product Category

Refer to the applicable category below for required submissions. The complete audit report, corrective actions and certificate must be available for review by Own Brands FSQA upon request.

- 1. Human and Animal Food
 - a. Global Food Safety Initiative (GFSI) certification.
- 2. Non-Food Regulated by the Consumer Products Safety Commission
 - a. ISO 9001 certification.
 - b. Documented pest control program
 - c. Product testing program
 - d. Product traceability system
- 3. All Other Non-Food (including medical devices, items that come in contact with food or skin, etc.)
 - a. Annual third-party facility cGMP audit.

B. Additional Requirements for International Vendors

- 1. An annual third-party audit report of Social Accountability or Code of Conduct from an approved firm, is required.
- 2. The complete audit report, corrective actions and certificate must be available for review by Own Brands FSOA.

3 New Vendor Certification Approval Process and QA Follow Up Audits

A. Certification Audits

Own Brands FSQA may require a Certification Audit of all new Vendors or new facilities of existing Vendors to be performed either by a third-party auditing firm or by Own Brands FSQA.

- 1. All Vendors previously approved as an Albertsons supplier through Supervalu will be granted continuous approval status under the combined company.
- 2. Audits must take place before any products are provided to Albertsons Companies for retail sale, **including** production in new or different facilities of previously approved Vendors.
- 3. Vendors must demonstrate that they have a satisfactory Food Safety and Quality System.
- 4. Albertsons Companies may require a Certification Audit for line extensions.
- 5. Vendors will be responsible for Certification Audits costs. Contact your Sourcing Representative for applicable audit fees.





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C. Follow-up Process Validation Audit and/or Re-Certification Audits

- 1. Own Brands FSQA may require a Process Validation Audit or Re-Certification Audit to be performed either by a third-party auditing firm or by Own Brands FSQA in the event of the following:
 - a. Recall
 - b. An early warning quality or specification compliance issue that is not effectively resolved
 - c. Quality withdrawals
 - d. Non-compliance with the Vendor Quality Requirements Policy
- 2. If a Vendor has not produced an Own Brands product for a year or more, the Vendor status is considered inactive. If the Vendor wishes to be considered for recertification, they must contact their Own Brands Sourcing representative to discuss audit arrangements. Upon direction from Sourcing, a recertification audit may be required by Own Brands FSQA. If the facility is approved, it will be regarded as a new Vendor and subject to the rules outlined in this document.
- 3. Vendors will be responsible for all audit costs.

D. Posting of Audit Results to SpecConnect

- 1. The complete audit report, including noted deficiencies, corrective actions and certificate (if applicable) must be posted to SpecConnect (see Section 7A).
- 2. Posting must be done within 14 days of receipt of the final audit report via a plant audit task.
- 3. Vendors must notify the QA Own Brands account via SpecConnect when the plant audit task is complete.

4 WATER AND AIR QUALITY

All plants must have validated, verified and documented water and air monitoring programs in place.

A. Water Usage in Product or in Product Contact

Water must be tested annually for potability and pose no risk of contamination. Municipal water reports alone will not suffice, as they may not accurately reflect the condition of delivery lines within an operation. Special circumstances, such as the use of well water, may require more frequent water testing.

B. Cooling Systems

Manufacturers must be able to demonstrate the water used for indirect cooling does not pose a health risk.

C. Backflow Prevention

- 1. Backflow prevention systems must be in place anywhere there is a risk.
- 2. Systems must be tested annually and results documented.

D. On-site Water Treatment

Water treatment records must be maintained.

E. Air Usage in Product or in Product Contact

Air used in the manufacturing process for food or food contact packaging must be treated by filtering and/or ultraviolet light exposure.

5 MICROBIOLOGICAL CONTROL SYSTEMS

A. Programs

- 1. All Vendors must establish validated, verified, and documented microbiological testing and control programs to ensure the safety of products for human or animal use or consumption, and to meet the requirements set forth in Own Brands product specifications.
- 2. A validated environmental testing program must be included.
- 3. Ingredient safety must be evaluated and appropriate testing programs established. Testing may be by active sampling or by certificate of analysis. If COA's are used, a system must be in place to verify their validity.
- 4. If pathogenic testing is conducted on finished product, product must be held and controlled at the Vendor's site pending results.

B. Testing

- 1. Microbiological testing may be conducted in-house or by accredited third-party labs (preferred).
- 2. All methodologies used must be from an approved source such as: FDA BAM, United States Pharmacopeia or European Pharmacopeia and recognized for the product. Methods developed for a product may be used if they have been specifically validated for the product. Laboratories are to be compliant with current GLP's.



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6 FOOD ALLERGEN CONTROL PROGRAMS

All plants using or storing allergens must have validated, verified, and documented allergen control and testing programs. <u>Allergen and Food Intolerance Guidelines</u>

7 DOCUMENT EXCHANGE AND SPECIFICATION COMPLIANCE

A. SpecConnect

- 1. All Vendors are required to register and maintain an account with SpecConnect, a secure web based specification system hosted by Trace One.
- 2. Registration on SpecConnect must be completed prior to first production.
- 3. Vendors are required to create and maintain their plant profiles and key contacts for each facility that supplies Albertsons Companies with an Own Brands product.
- 4. Vendors must maintain up-to-date finished product information.
- 5. Own Brands FSQA will issue specific product or plant tasks via the system. Vendors are required to take the necessary actions to respond and complete each task.
- 6. Albertsons Companies utilizes SpecConnect to manage:
 - Vendor communication
 - Vendor information & contacts
 - Product specifications
 - Plant audit records and certificates
 - Product test data, certificates, and affidavits
 - Quality incident resolution
 - Vendor access to QA policies and procedures

B. Specifications

All Vendors are required to ensure that product information in the SpecConnect is current and accurate.

- 1. An approved product specification must be on file in SpecConnect prior to first production.
- TraceOne hosts the system for Albertsons Companies at: https://cpdus.traceone.net/PVC/Agentrics.PLM.Net.Web/Logon.aspx?RetailerId=14
- 3. All plants must have written packaging and label specifications and documented label checks for packaging materials.
- 4. All completed specifications must contain acceptance and fail criteria for microbiological, chemical, physical and sensory attributes using accurate and repeatable testing methodologies.

C. Process Controls

- 1. All plants must have validated, verified and documented quality testing programs in place to ensure compliance with Own Brands specifications.
- 2. Process control systems must be in place to ensure conformance to specifications.
- 3. Validated, verified and documented equipment calibration and verification programs must be in place.

D. Raw Materials

- 1. **Transportation:** Trucks, railcars, tankers or similar transportation carriers must be inspected prior to unloading and inspections must be documented.
- 2. First-in-First-out rotation of raw materials should be in place.
- 3. Raw Material Evaluations: Programs must ensure that raw materials conform with specifications in order to ensure that finished products will conform to specifications.
- 4. Where incoming raw material testing program is not applicable or not applied, a certificate of analysis receipt and review must be in place. This program must be based on a validated risk assessment for both quality and food safety of the product.

E. Net Content Control

- 1. Statistical Process Control methodologies must be used to ensure product net weights conform to requirements
- 2. Validated, verified and documented calibration and verification programs must be in place for all scales and checkweighers.
- 3. Vendors who are cited for net weight violations are subject to implementation of requirements above NIST Handbook 133 requirements.
- 4. For more details see Net Weight Requirements and Fill Level Policy



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F. Rework

A detailed written procedure for the handling, use and addition of rework must be in place to ensure compliance to specifications, product integrity, product safety and traceability.

G. Product Hold Procedures

Detailed Hold Procedures must be on file to address ingredients, packaging materials or finished products that do not conform to specifications. Procedures are to include the following requirements:

- 1. A system for easy identification of product that is on Hold. This may include colored tags or signs. Information on the tags/signs should include the item on Hold, the code date or lot number, quantity placed on Hold, and the date the Hold was generated.
- 2. A process for approving and controlling disposition of product on Hold.
- 3. A log of all Holds including:
 - Date
 - Unique identifier
 - Products involved
 - Item counts
 - Reason
 - Person approving disposition
 - Disposition
 - Person responsible for the disposition
 - Date of disposition
- 4. A designated Hold area that is clearly marked and controlled. Employees must demonstrate understanding that products in this area are not to be used.

H. Distribution

All products shipped to Albertsons Companies must comply with practices associated with the legacy Albertsons, legacy Safeway, and non-Albertsons/Safeway distribution centers. Each distribution center may have different standards and practices and Vendors should contact their Procurement Representative for specifics.

I. Product and Process Changes

Processing changes that could affect specification compliance or shelf life require prior approval:

1. Approval

Products shall not be changed in any manner without Albertsons Companies prior approval, which will be granted or denied in accordance with the <u>Product Change Approval Requirements.</u> Submit the <u>Product Change Request Notification Form</u> to your Quality Representative.

- 2. Non-Compliance
 - a. Any Own Brands product that is changed without authorization or that is non-compliant in any manner with applicable specifications, is subject (without limiting other damages that may be available) to rejection and/or withdrawal from Albertsons Companies stores at the Vendor's sole expense.
 - b. Vendors that fail to comply with the Product Change Approval Requirements are subject to de-certification.

8 Labeling and Coding of Consumer Units and Master Containers

A. Date Coding

See detailed requirements in **Own Brands Product Dating and Coding.**

B. Kosher Labeling

- 1. Use of any Kosher symbol requires prior approval from Own Brands FSQA and Product Development.
- 2. If a Kosher symbol is used, a letter from the certifying agency must be on file clearly stating the name of all Own Brands items covered by the certification and the time period covered by the certification.
- 3. The use of a plain "K" is not permitted.

C. Organic Labeling

Lucerne Foods Inc. is certified as an Organic Trader.

- 1. All organic products must meet USDA definitions for 100% Organic, Organic, or Made with Organic Ingredients.
- 2. Each plant must have a compliance program that has been approved by a USDA-approved agency.
- 3. Prior to first production, all Vendors must submit a copy of their organic certification and a product summary listing by brand name all of the items they produce for Own Brands.



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- 4. Vendors must maintain up-to-date organic certificates.
- 5. Only an Albertsons Companies approved Organic Certification logo can be printed on the label.

D. Gluten-Free Labeling

All Vendors who manufacture "Gluten-Free"-labeled products are required to comply with the <u>Own Brands Gluten</u> Free Policy .

E. Country of Origin Labeling (COOL)

All Vendors are required to comply with Country of Origin labeling regulations and the <u>Own Brands Product Dating</u> <u>and Coding</u> requirements.

9 FINISHED PRODUCT TESTING

A. Retention Samples

- 1. Vendors are required to have established objective shelf-life failure criteria.
- 2. Vendors must provide initial validation of stated stability/shelf-life for all new products.
- 3. Continued monitoring of stability/shelf-life performance is required.
- 4. Vendors are required to notify Own Brands FSQA in the event of significant shelf-life failures.

B. Evaluation Samples

- 1. For some new products, or for quality or specification compliance issues, Vendors may be required to provide samples for evaluation by Own Brands FSQA.
- 2. The cost of samples and shipment will be the responsibility of the Vendor.

C. Certificates of Analysis (COAs)

- 1. Own Brands FSQA may require finished product test results for Own Brands products. See <u>Third-Party Product Testing Requirements For Own Brands Products</u>.
- 2. This requirement will be based on product risk and attributes such as quality, functionality, safety, performance, packaging, environmental or other claims.
- 3. Third-party testing may be required at the Vendor's expense.
- 4. COAs are to be uploaded to SpecConnect (see Section 7 Document Exchange and Specification Compliance)
- 5. Seafood Vendors:
 - a. Own Brands imported fin fish Vendors must comply with the requirements outlined in our policy Imported Packaged Fin Fish Testing Requirements.
 - b. Own Brands shrimp Vendors must comply with testing requirements contained in the specifications. Shrimp Inspection and Test Requirements

10 CONSUMER COMPLAINTS

A. Albertsons Companies Customer Support Center

- 1. Weekly Reports of all consumer feedback will be provided to each Vendor for comments received the prior week.
- 2. An Early Warning report will be issued to the Vendor when three complaints have been received within 14 days for:
 - a. The same SKU (UPC), and
 - b. The same type of complaint (e.g. wood, bloating, etc.)
- 3. Samples obtained from consumers will be provided to the Vendor for investigation (e.g. foreign material).

B. Vendors

- 1. Weekly Reports are to be reviewed to determine plant-controllable complaints such as foreign material, missing components, early spoilage, missing/incorrect codes, defective packaging, etc.
- 2. An <u>Issue Resolution Form</u> must be completed for:
 - a. All foreign material findings
 - b. Actionable complaints from the Weekly Report (submit to the Own Brands FSQA Manager)
 - c. Actionable complaints from the Early Warning Report (submit to the Own Brands FSQA Manager)

11 RECALLS AND WITHDRAWALS

A. Traceability

1. All facilities must have programs in place to ensure the traceability of raw materials, reworked product, food contact packaging and finished product





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2. All incoming raw material lot numbers should be identified on the Bill of Lading

B. Recalls and Withdrawals

- 1. A documented Recall/Withdrawal Procedure must be in place and the finished product lot numbers shall be identified on the Bill of Lading
- 2. In the event of a product defect requiring withdrawal or recall, the Vendor shall contact an Own Brands FSQA Manager to discuss the appropriate action to take and the representative will assist you in determining which of the recall entities to contact via the contact method outlined in the Own Brands Recall/Withdrawal Process and Contact Tree. Each entity is aligned with specific distribution centers and banner stores. Each has a different recall/withdrawal center and execution process. Be prepared to complete a separate recall/withdrawal template as required. If your Own Brands FSQA Manager is not available, the Vendor may contact the recall entity directly.
- 3. Recalls requiring public notification/press release must be reviewed and approved by Own Brands prior to distribution

C. Mock Recalls

- 1. Vendors are required to perform three mock recalls per year:
 - a. Finished product
 - b. Ingredients
 - c. Food contact packaging
- 2. Results must be documented including:
 - a. Start Time and Finish Time
 - b. Percent of product accounted
 - c. Corrective action to address discrepancies if:
 - 100% +/- 2% is not accounted for within three hours
 - If more or less than 100%, reason for discrepancy
- 3. Notification to Own Brands FSQA is not required when conducting a mock recall. Documentation must be on file for each mock recall and made available upon request

12 REGULATORY ACTIVITY

A. FDA Bioterrorism Registration

1. Vendors need to ensure that all facilities that provide product to Albertsons Companies have registered with the FDA and have a current FDA bioterrorism registration number. This does not apply to USDA-inspected facilities. To ensure compliance, Vendor will provide evidence of registration upon request.

B. Licensing and Registration

1. Certain states have licensing and registration requirements above and beyond Federal registration requirements. It is the Vendor's responsibility to be familiar with the laws and regulation in every state in which their product will be sold. Vendors will be asked to submit proof of registration upon request. Unless otherwise directed, Vendors are responsible for completing and submitting all licensing and registration forms and paying all licensing and registration fees on or before the annual deadline.

C. Import Requirements

1. Vendors importing products will be required to comply with additional food product and inspection requirements in order to ensure product complies with all regulatory requirements for the retail markets in which the product will be sold.

D. Regulatory Visits or Violations

- If a facility producing Own Brands products is given corrective actions or is shut down by a State or Federal regulatory agency, the Vendor must inform their Own Brands FSQA Manager immediately. A copy of the regulatory visit document or Notice of Violation must be provided or made readily available to Own Brands FSQA.
- 2. Own Brands FSQA may require documentation that such corrective actions have been completed to the satisfaction of the regulatory agency or may require an on-site audit at Vendor's expense prior to authorizing resumption of production for Albertsons Companies.



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APPENDIX A: REFERENCES

A. Links

- 1. Safeway Supplier Site: http://suppliers.safeway.com/
- 2. U.S. Good Manufacturing Practices (cGMPs): www.access.gpo.gov/nara/cfr/waisidx 00/21cfrv2 00.html
- 3. FDA Defect Action Levels: http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/SanitationTrans
 portation/ucm056174.htm
- 4. U.S. Organic Information: http://www.ams.usda.gov/AMSv1.0/nop
- 5. Guidance on Inspections of Firms Producing Good Products Susceptible to Contamination with Allergenic Ingredients http://www.fda.gov/ICECI/Inspections/InspectionGuides/ucm074944.htm
- 6. TraceOne SpecConnect: https://cpdus.traceone.net/PVC/Agentrics.PLM.Net.Web/Logon.aspx?RetailerId=14
- 7. Global Food Safety Initiative (GFSI) http://www.mygfsi.com/
- 8. Own Brands Quality Assurance Recall and Withdrawal Contact Tree: http://suppliers.safeway.com/pdf/product_recall_process.pdf
- Albertsons Code Date Guarantee Policy to Distribution and Retail http://Vendors.safeway.com/usa/pdf/8020_3200minshelflife_distcenter.pdf

B. Documents

- 1. Quality Assurance Audit & Vendor Program Requirements Vendor Copy
- 2. Allergen and Food Intolerance Guidelines
- 3. Net Weight Requirements
- 4. Fill Level Policy
- 5. Vendor Shipping and Receiving Temperature Requirements Policy
- 6. Product Change Approval Requirements
- 7. Product Change Request Notification Form
- 8. Own Brands Product Dating and Coding
- 9. Own Brands Gluten Free Policy
- 10. Imported Packaged Fin Fish Testing Requirements
- 11. Shrimp Inspection and Test Requirements
- 12. Issue Resolution Form
- 13. Own Brands Recall/Withdrawal Process and Contact Tree
- 14. Third-Party Product Testing Requirements For Own Brands Products