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1. Purpose

Primary objective of Cargill is to fulfil its commitment in providing safe, quality products. The requirements provided in this manual are designed to help Cargill’s third-party warehouses and storage locations meet this objective by identifying those programs which will help protect product safety and quality, prevent product retrievals, customer complaints and non-conformances.

2. Scope

The following requirements apply to all third-party warehouse distribution facilities that store and/or distribute products or materials on behalf of Cargill, Incorporated and its affiliates (collectively, “Cargill”).

The scope covers all raw materials noted in the annex, ingredients, processing aids, packaging materials, semi-finished and finished end- products (from receiving through shipping of food, feed/ animal food, pharmaceutical, cosmetics, personal care, dietary supplements). Processes related to Industrial Business are out of scope, unless noted in the annex.

The requirements in this manual are based on the following internationally recognized external standards and technical specifications, supplemented by Cargill-defined requirements including:


- Codex Alimentarius
- BRCGS Storage & Distribution
- IFS Logistics
- SQF Food Safety Code: Storage and Distribution
- FSSC 22000
- AIB International Standards for Inspection, Prerequisite and Food Safety Programs

Where in doubt, the provisions of the above listed standards will be held to apply unless superseded by a Cargill defined requirement.

The term “shall” in this document designates the manual’s requirements. The term “should” designate recommended practices and are not requirements.

All requirements of this document are generic and are intended to be applicable to all operations of Cargill’s third-party warehouses and storing locations regardless of size and complexity.


Specific requirements depending on the intended product use are described under annexes.

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Note: Packed goods warehouses are permitted to re-palletize materials, so long as they remain in their primary packaging. If a warehouse is opening the primary packaging, and exposing the material, then they would become an External Manufacturer and it is out of the scope of this manual.

3. Definitions & Abbreviations

3PL Management 483 Form	Third-party logistics management A Food and Drug Administration (FDA) Form 483 is issued to firm management at the conclusion of an FDA inspection when an investigator(s) has observed any conditions that in their judgment may constitute violations of the Food Drug and Cosmetic (FD&C) Act and related Acts. This may apply to locations shipping materials into the United States. A detailed list of a shipment of goods in the form of a receipt given by the carrier to the person consigning the goods
AIB	American Institute of Bakery
Batch Numbers	Batch and lot number terms are interchangeable
Bill of Lading (BOL)	A detailed list of a shipment of goods in the form of a receipt given by the carrier to the person consigning the goods
BRCGS	British Retail Consortium Global Standards
ERP	Enterprise Resource Planning system (e.g., SAP, JD Edwards, CMMP, etc.)
FEFO	First Expired First Out Inventory management method
FIFO	First in First Out Inventory Management Method
FSQR	Food Safety, Quality and Regulatory Affairs
FSSC 22000	The FSSC 22000 Food Safety System Certification provides a framework for effectively managing an organization's food safety responsibilities. FSSC 22000 is fully recognized by the Global Food Safety Initiative (GFSI) and is based on existing ISO Standards
IFS	International Food Standard
ISPM 15	International Standards for Phytosanitary Measures No. 15 is an international phytosanitary measure developed to address the regulation of wood packaging material in international trade
KPI	Key Performance Indicator. A business metric used to evaluate factors that are crucial to the success of the 3PL
LPG Powered Lift Trucks	LPG (liquified petroleum gas) lift truck
Master Sanitation Schedule (MSS)	A master cleaning schedule of all internal and external areas of the warehouse. The schedule defines the area, frequency of cleaning, and the person(s) responsible for the cleaning
Materials	Unless further specified includes all raw materials (primary products) as further processed (intermediate/by/co-products) up to finished products. It includes all added/applied products, e.g., additives, ingredients, processing aids, biocides, plant protection products as well as food contact materials
Pest Control Officer (PCO)	A Pest Control Officer is a certified pest control operator who is responsible for executing the requirements of the pest control program
PSQR	Product Safety, Quality, Regulatory Affairs

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RIM Global Policy
SQM
Third-party Warehouse

Cargill’s Record and Information Management Policy
Supply Quality Management
A third-party legal entity where Cargill owned materials are stored and which can only be released by Cargill


Significant Changes or Trigger:

- a. Ownership Changes at a 3PL
- b. Product additions or changes which have potential to negatively impact stored product (e.g., new product type, raw agricultural commodities, allergenic materials, potentially hazardous materials, etc.)
- c. Fire, explosions, or water damage
- d. Natural disasters or catastrophic events
- e. Security breaches
- f. Facility involvement in a product recall or withdrawal
- g. FDA or governmental notification of a 483-form depending on region
- h. Any type of document issued by the Official Control Authorities stipulating non-compliance or a potential non-compliance with all applicable Food, feed, Cosmetic & Personal care or pharmaceutical legislation, for example an FDA 483-form
- i. Any new pesticides usage or pest infestations including fogging and fumigation
- j. Failed customer or third-party audit or audit(s) with major/significant findings
- k. Facility deterioration leading to unsatisfactory facility conditions
- l. Facility modifications

4. Responsibilities

4.1. Third-party Logistics (3PL) Management Responsibility for Product Safety

- Responsibility and authority for ensuring warehouse operations are in compliance with all applicable country, state, and appropriate regulatory laws shall be clearly assigned to competent management personnel. The facility’s organizational chart shall identify the position(s) responsible for product safety.
- The person(s) responsible for product safety shall establish procedures and records for use to document pertinent information pertaining to the facility’s quality management system. The 3PL’s quality management system will at a minimum meet the standards identified in this manual, which are aligned with Global Food Safety Initiative Standards (FSSC 22000) as well as other applicable certification standards.
- 3PL Management is responsible for promptly communicating any trigger or significant changes occurring at the warehouse distribution centre to all Cargill businesses represented at the 3PL. This communication shall occur within 4 hours of any safety concern or otherwise within two business days of the event. This communication shall occur with the primary Cargill warehouse contact.
- Product safety training (including but not limited to: regulatory inspections, allergens (if applicable), shipping and receiving procedures, good hygiene practices, sanitation, pest control, and documentation practices) is required for new employees and retraining is required annually. Training requirements and records of completion shall be documented.
- The facility shall establish and maintain a defined cleaning program, along with Master Sanitation Schedules (MSS) for all areas of the facility. The MSS shall specify who will clean, how cleaning shall occur, and frequency of cleaning. These requirements shall be documented in Standard Operating Procedure(s) (SOP).

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- Chemicals and cleaning supply use shall be documented, and chemicals shall be stored in a secured location.
- The facility shall document incoming/outbound material inspections and shall include all relevant information (such as: critical temperatures, seal checks, material batch numbers, etc.).
- A formal recall document and practice retrieval exercises shall be conducted and documented at a minimum of annually.
- The facility shall have a procedure for handling regulatory inspections, which should address accompaniment of inspectors while onsite, photos, obtaining samples, and copying records.
- Cargill shall be informed immediately of any requests by the Official Control Authorities to view Cargill records prior to sharing the information. Cargill shall be informed of any information shared or samples taken that involve Cargill production.
- In the case of other third-party Audit requests, Cargill shall be informed immediately of any requests to view Cargill records prior to sharing the information.
- The facility shall have a pest control program that adequately prevents pest ingress and harbourage areas. Pest control programs shall be administered by an appropriately certified Pest Control Officer (PCO). The facility shall have an assessment and trending of activity completed at a minimum of annually.
- Maintenance of the warehouse and warehouse conditions are the responsibility of the 3PL.
- The 3PL shall have appropriate maintenance and contractor programs to ensure product is not compromised when work is being performed at the facility. Maintenance and contractors shall have appropriate training to ensure product safety guidelines are adhered to. For example, product may need to be moved to allow the contractor ample area to conduct the work needed and allow for cleaning after work is completed.
- Where applicable, all policies and procedures shall be written in language(s) all employees can read.


4.2. Cargill's Responsibilities

4.2.1. Cargill's Food/Product Safety, Quality, & Regulatory (FSQR - PSQR) Operations

- Periodically assess the facility either directly or indirectly through a third-party audit according to the warehouse contract. For audits conducted by Cargill, the Corporate FSQR Warehouse Audit Form should be used. Details of the warehouse audit including the appropriate frequency of audit can be found under third-party Warehouse Audit and Qualification Requirements document, GSC-WH-002. The auditor shall receive the Corrective Action Register (CAR) from the warehouse team within one month following the submitted report. Coordinate with Cargill warehouse contact to ensure findings are closed and corrective actions are effective within six months (or earlier if required following a non-compliance or safety related observation) following the original audit submittal date. If capital investment is required to complete corrective actions, extensions may be granted to close findings. Depending on the product safety risk, repeated findings may lead to nonapproved status or increased surveillance.
- Communicate any Cargill Food or Product Safety Policy changes.
- Provide support to the Cargill Warehouse Lead/ Coordinator/ Planner/ Manager.
- Authorize Return Goods Approval (RGA).

4.2.2. SQM & Audit team

- Responsible and accountable for product safety assessment of third-party warehouses as well as for governance processes of third-party warehouse audits. Raw agricultural materials are out of scope for the SQM & Audit team and management of those commodities is done by FSQR raw material team. Additionally, Cargill Protein Europe

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warehouses are out of scope for the SQM & Audit team and management of those warehouses is done by the respective businesses.

- Global SQM team owns present guidance and revises it as needed.

4.2.3. Cargill’s Warehouse Lead / Coordinator / Planner

- Primary 3PL contact.
- Communicate any warehouse related issues to key Cargill Stakeholders. Organize, when necessary, stakeholder meetings.
- Cargill’s requirements for the storage and/or distribution of their product shall have been agreed and documented prior to fulfilment. This shall include any specific handling requirements for the products, e.g., temperature, humidity, light conditions, stack height or compatibility requirements.
- Any changes to existing agreements or contracts shall be agreed, documented, and communicated.
- Coordinate with Cargill Warehouse and Terminal Group contractual review or warehouse related complaints/concerns.
- Establish 3PL metrics Key Performance Indicators (KPIs).
- Coordinate with FSQR or PSQR designee to address any 3PL audit findings and needed warehouse improvements.
- Coordinate the CAPA implementation.

4.2.4. Cargill’s Storage & Real Estate or Cargill Supply Chain Department

- Meet with Cargill stakeholders to review warehouse performance prior to contract renegotiation.
- Review and document warehouse performance annually.
- Provide support for Cargill businesses utilizing 3PLs.
- Ensure the warehouse requirements in this document are incorporated by reference into all future warehouse contracts.

5. Procedure


5.1. Introduction

Storage and warehousing of materials shall be under conditions that will protect as appropriate against physical, chemical, and microbial contamination as well as against damage of the material and its packaging.

Storage and services shall be performed in accordance with all applicable legislation and industry sector codes of practice (or equivalent recommendations/guidance) and in particular Hygiene and Storage related legislation. All necessary legal authorisations to carry out materials storage shall be obtained, and specific national requirements as amended shall be met. As a minimum, food hygiene requirements shall meet the Codex Principles of General Food Hygiene CXC –1 1969. Additionally for animal food Code of Practice on Good Animal Feeding CAC/RCP 54-2004 shall be respected.

All warehouse distribution facility personnel are expected to understand and comply with these requirements and guidelines. Any questions or concerns should be directed to either the designated Cargill Warehouse Lead or Food Safety, Quality & Regulatory (FSQR) contact.

Cargill may perform periodic quality, good warehouse practice, GMP/PRP, and inventory management audits. The provided guidelines are to be used as minimum standards, and it is expected that each facility will build upon and exceed these standards to react and adapt to the unique circumstances of each facility.

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Materials are not to be further placed on the market (I.e., transferred to another premises or (legal) entity other than those owned by the third-party Warehouse) except under the express instructions of Cargill. The following exceptions are made:

- Orders/requirements issued by the Official Control Authorities
- Force Majeure cases where material needs to be rapidly transferred to avoid damage, etc.

5.2. Quality Management System

The warehouse establishes, documents, implements and maintains a quality management system with clearly defined responsibilities, standards and implemented procedures as a means of assuring that Cargill materials are handled, stored, and transported in conformance with these requirements, Cargill specifications and any applicable regulatory requirements. The quality management system documentation shall include documented procedures for the warehousing, handling, storage of Cargill materials.

5.2.1. Management responsibility


The 3PL management shall prepare and implement a policy statement that outlines at a minimum the commitment of all warehouse management to:

- Store and transport materials in a manner which maintains materials' safety and quality
- Establish and maintain a product safety culture within the warehouse
- Establish and continually improve the warehouse's product safety management system
- Comply with Cargill's requirements and regulatory requirements to supply safe materials

5.3. Prerequisite program (PRP) requirements

5.3.1. Storage of materials

1. Facilities used to store materials shall provide protection from dust, condensation, drainage, waste, and other sources of contamination.
2. Storage areas shall be dry, odour free, and appropriately ventilated as appropriate. Monitoring and control of temperature and humidity shall be applied where specified in the contract.
3. Storage areas shall be designed or arranged to allow segregation of packaging supplies, ingredients, and finished products.
4. With the exception of raw materials and certain intermediate materials (such as oil seed meals), all materials shall be stored off the floor (shall be stored on pallets and on slip-sheets upon customer request, unless alternative or additional storage conditions are set) and with sufficient space between the material and the walls to allow inspection and pest control activities to be carried out.
5. The storage area shall be designed to allow maintenance and cleaning, prevent contamination, and minimize deterioration.
6. A separate, secure (locked or otherwise access controlled) storage area shall be provided for cleaning materials, chemicals, and other hazardous substances. Any chemicals stored in the warehouse areas shall be properly labelled and approved for proper usage.

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7. Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from harbouring pests or vermin.

5.3.2. Personnel Hygiene Principles

The warehouse’s personal hygiene standards shall be documented and adopted by all personnel, including agency staff, contractors, drivers, and visitors to the warehouse regarding the risk of product contamination.


1. Facility shall implement personal hygiene practices to eliminate cross contamination potential from employees, such as hand washing, clean personal protective equipment, and clean garments. Personal items shall be stored away from warehouse operating areas.
2. Facility programs shall prohibit eating, drinking, chewing, smoking and/or use of tobacco in the warehouse product storage area. This will be confined to designated areas, away from any Cargill product. Adequate arrangements for smokers' waste shall be provided at smoking facilities. If a policy is in place to protect stored material, water may be allowed in designated warehouse locations.
3. Facility shall have programs to ensure no cross-contamination potential from persons with boils, sores, infected wounds, or other infectious diseases.
4. Hand washing facilities shall contain soap or appropriate sanitizer, water and paper or air hand dryers. These shall be located away from Cargill products and not open directly into product storage areas. Proper signage outlining hand washing requirements shall be prominently posted.
5. At no time should any warehouse employee stand on or walk across product, either in the warehouse or in trailers.
6. Clothing articles shall be stored properly to prevent contamination. Work wears are free from rips, tears, or fraying materials. It is generally recommended that work wear does not have buttons or outside pocket above the waist.
7. On-Site contractors shall follow good hygiene principles.
 - a. On site contractors shall be required to report any incidents to warehouse management that may lead to a product safety incident. Examples would include but not limited to incidents such as water leaking onto product during a roof repair or glass breakage during lighting replacement.
 - b. Contractors shall take all necessary precautions to protect the product within the storage facility.

5.3.3. Facility Design, Layout, and Internal Structures

The warehouse shall be located and maintained as to provide protection and prevent hazards to products. Safety, legality, and quality of products shall not be compromised.

Consideration shall be given to local activities and the environment which may have a potentially adverse impact on products, and measures shall be taken to prevent product contamination.

1. The building shall not have any openings, which would allow pests to enter. All doors and windows shall be kept closed. In case of open windows, they should be protected by appropriate screens. It is recommended that windows that can be opened directly to the outside should be fitted with insect-proof screens with a maximum diagonal size of 2 mm. (1mm*1mm). Smaller size (0,6 mm) is recommended for fruit fly. All above mentioned screens should be removable for cleaning and need to be routinely checked to ensure they are not damaged.
2. The floor shall be clean and free of untreated cracks where product can accumulate (creating pest harbourage). All grounds within the warehouse shall be finished and maintained to an appropriate standard.
3. All trash containers (interior and exterior) shall be sufficiently covered and emptied on a regular basis and not overloaded. Trash containers shall be properly labelled, or colour identified.

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4. Any spilled product shall be promptly cleaned and properly disposed, as set out upon non-conforming product requirements.
5. All overhead pipes, ducts, fans, etc. shall appear clean, free of any leaks and in working order to prevent product contamination. The roof should be free of any leaks. Condensation should be controlled to prevent contamination to Cargill products.
6. There is adequate lighting in storage area and all dock and overhead lights shall be working and properly shielded (no un-protected glass).
7. Strong odorous materials, such as spices, etc., shall be segregated from other Cargill materials to prevent transfer of the odours where such odours could negatively impact Cargill materials.
8. Vehicles other than lift trucks are prohibited within the contracted warehouse. If alternative vehicles are necessary for the materials stored in the location, written approval shall be provided by Cargill.
9. Only electrical (battery) and LPG powered lift trucks will be used within the contracted warehouse. By agreement, alternative lift truck types may be approved for various regional warehouse locations.
10. Hand trucks, hand jacks and forklifts, as well as other equipment shall be maintained in a clean condition and inspected at an established frequency for evidence of grease, broken glass, and be in proper working order.
11. External storage shall be avoided. Upon agreement with Cargill FSQR-PSQR department, external storage may be accepted under the condition that it is minimized, items are protected from contamination and deterioration and there is no product safety risk.
12. The warehouse is adequately protected against fire and flood incidents as well as other environmental exposures (e.g., storm, earthquake). Any such event shall be communicated to Cargill immediately ensuring the product safety.


5.3.4. Sanitation/Cleaning

Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained at all times and that risk of contamination is minimized.

The premises and equipment shall be maintained in a clean and hygienic condition.

When appropriate, documented cleaning schedules shall be in place and implemented for the building, vehicles, plant, and all equipment. The frequency and depth of cleaning shall be based on risk. Cleaning procedures shall include, where applicable:

- responsibility for cleaning
 - the item/area to be cleaned
 - frequency of cleaning
 - method of cleaning
 - cleaning chemicals and concentrations
 - cleaning materials to be used
 - cleaning records and responsibility for verification
1. All sanitation tools shall be suitable for their purpose and shall be clean and stored in a manner to prevent contamination. Clean-up tools shall be stored in a sanitary manner.
 2. Detailed written cleaning procedures (SOPs) shall be created and in use at the facility for each area/equipment used to store Cargill product.
 3. The Warehouse shall have a Master Sanitation Schedule (MSS) to document adherence to cleaning requirements in the Warehouse Program. All areas of the facility shall be cleaned a minimum of annually.
 4. A trained person shall sign-off once cleaning has been completed. A trained person shall verify and document the

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program is properly followed.

5. Employees responsible for the MSS tasks shall be trained on the cleaning procedures and the training shall be documented.

5.3.5. Maintenance

A system of planned maintenance shall be in place covering all items of equipment which are critical to product safety and quality. The maintenance requirements shall be defined when commissioning new equipment. All third-party contractors and engineers shall be aware of and adhere to product safety standards. All significant facility changes shall be documented, reported, and communicated to Cargill.

1. An appropriate preventive maintenance (PM) program shall be in place to ensure critical product protection devices are effective. Examples include dock seals and shelters, door seals, overhead lighting, fork trucks, dust collectors, air filters, temperature control and recording devices, etc. The PM program shall be documented, and the records shall be saved.
2. Building and grounds shall be maintained in a manner that will prevent the possibility of process/product contamination.
 - a. Properly store equipment that is not in use. Maintenance utensils used during repairs are well organised to avoid process/product contamination. Finished the work, all debris has been removed.
 - b. Remove litter, waste, weeds, and grass from the vicinity of the building and grounds.
 - c. Provide adequate drainage so there is no standing water.
 - d. Vegetation shall be limited to prevent pest entry. Vegetation shall not be located within 18" (equal to 0.457 meter) of the facility perimeter nor hanging over the roof.
 - e. Install and maintain waste or scrap compactors and/or covered dumpsters to minimize leakage and contain waste materials. Containers shall not create a harbourage area or attract pests. Containers should be monitored/treated by waste management and pest control to prevent this.
3. Facility shall be constructed, designed and suitable in size, layout and/or partition to allow maintenance and sanitary operations for materials in storage.
 - a. Equipment shall be designed and located to allow effective cleaning.
 - b. Temporary repairs shall be permitted in emergencies and where product contamination is not at risk. They shall not be used except as a short-term fix, subject to a time limit and a scheduled plan for permanent repair shall be on file for the equipment in this status.


5.3.6. Equipment

Equipment shall be suitably designed and approved for the intended purpose according to current legislation (e.g., food contact approved equipment) and shall be used to minimize the risk of damage to or contamination of products.

Roll cages, pallet lifts and forklift trucks shall be maintained in a good working condition to prevent product damage or foreign material from being placed onto the product.

All diesel-powered handling equipment, where used, shall incorporate an appropriate exhaust filter system for the removal of particulates that can pose a contamination risk to product.

Where physical automation systems (including vertical lifts, retrieval systems, conveyor systems, robotics, etc.) are used for product-handling activities, product safety should be guaranteed.

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Where appropriate, procedures shall be in place to monitor the condition of wooden pallets and plastic trays to prevent the risk of contamination or damage to products.

Knives or other tools provided shall be used in such a way as to prevent damage to products. Snap-off blade knives shall not be used.

Any tools which are lost, misplaced, or damaged above product shall be reported and investigation shall occur. Equipment and utensils are in good state of repair and only used for its intended use.


Leakages (product, oil, grease, lubricants) shall be avoided and leakages inspection shall take place at appropriate frequency.

5.3.7. Pest Control

It is required that each Warehouse maintain an appropriate pest control program from an outside certified firm or certified and qualified internal person. Each warehouse shall have a contact person for Pest Control review. This person shall review results of the Pest Control Operator (PCO) activities and sign off to verify records are reviewed on a regular basis. Records shall be maintained for each inspection documenting deficiencies, corrective action, and any use of equipment/pesticides. All deficiencies, corrective action, and pesticide usage will be shared with the appropriate warehouse contact.

The contract pest control service shall have a copy of their up-to-date license and insurance certificate available on site. Employees shall be trained and understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager.

1. At a minimum, a certified pest control operator shall be on site to check pest control equipment monthly. Results shall be reviewed with 3PL designated contact after each visit.
2. Pest management programs shall be documented/contracted and shall identify target pests, plans, schedules, and all other necessary requirements for the PCO.
3. Any evidence of pests shall be promptly removed. The source of the issue shall be investigated and resolved.
4. A site map shall be maintained showing the location of all mechanical traps and outside bait stations. Stations shall have specific identification, indicating the date of last service. Poison bait is not allowed inside the facility.
5. Only biocides (insecticides/ rodenticides etc.) approved by Cargill may be used near Cargill products. SDSs and usage labels shall be available for all chemicals used for pest control purposes. This list of chemicals shall be reviewed yearly to assure use of legally permitted/appropriate chemicals.
6. All pest control devices shall be properly installed, operated, secured (if stored on site they shall be segregated in a secured area), labelled, cleaned, and well maintained.
7. When temporary traps, glue boards, or pheromone traps are used, their use shall be properly documented on the Pest Control Map and all items shall be accounted for.
8. Material found to be infested shall be handled in a way to prevent contamination of other materials present in the establishment. Infestations shall be reported to Cargill within 24 hours of their discovery or earlier within agreed timeline if potentially have impacted the merchantability of Cargill's stored products.
9. In cases when fogging or spraying, or fumigation is required to manage specific infestation incidents in rooms, storage sheds or other buildings where Cargill product is stored, a written agreement with Cargill FSQR is needed.
10. Results of inspections shall be analysed to identify and communicate trends, if applicable to Cargill.

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5.3.8. Contamination Prevention

5.3.8.1. Physical Contamination

a. Glass, Brittle and Hard Plastic Policy (GBHP)

- i. The use or presence of glass in all warehouse facility areas, where the potential for material contamination exists, is prohibited. Any lights in the area of stored food, feed, technical, cosmetic & pharma grade materials shall be shielded. A routine, documented audit is required to ensure that potential GBHP issues are identified and corrected. Where glass is necessary in the facility, a GBHP register is required. A GBHP review shall be documented at a defined frequency.
 - ii. Glass breakage shall be reported immediately. Facility shall have a glass clean-up SOP stating requirements for assuring adequate cleaning, inspection, and documentation by a qualified individual.
 - iii. Any GBHP piece broken directly over a product shall be reported to Cargill for disposition.
- b. Wood usage shall be limited within the storage area as much as possible. Facility shall have a documented program of inspection for damage, cleaning, and appropriate use of pallets, including stacking heights and appropriate storage to prevent pest harbourage.

5.3.8.2. Chemical Contamination

a. Allergen

The warehouse shall have a system for the management of allergenic material which minimizes the risk of allergen contamination of products. This shall consider the particular packaging formats of products that are at an increased risk of damage, along with the physical state of any allergen-containing products (e.g., powder, liquid, particulate). The program shall be shared with all applicable employees via regular training sessions. Allergens within personnel lunches or within vending items in break areas shall be identified, trained and controlled to identified areas only. Issues involving allergen mishandling shall be communicated to warehouse management. Any issues of cross-contamination with Cargill product shall be communicated to the Cargill contact.


A documented allergen management plan shall be established to mitigate the cross-contamination risk to products. Control measures shall include:

- spillage controls
- specific handling procedures to reduce product damage
- dedicated cleaning tools
- segregation requirements
- knowledge of which allergen product types are stored in the warehouse/ storage areas
- any additional controls requested by Cargill

Spillage procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated and routinely verified for their effectiveness.

Allergens should be identified on the product labelling and/or if packaged for sale at B2B label on the product data sheet or other accompanying documentation. The facility shall have a process by which products containing allergens can be identified. Products shall be protected from unintended allergen cross-contact by segregation.

- i. Like allergens shall be stored with like allergens.
- ii. Allergenic products shall be stored at floor level, if possible.

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- iii. Allergen containing products shall not be stored above non-allergen containing products within the racks/bays.
- iv. Allergenic and non-allergenic products shall not be double stacked.
- v. Cargill requires a minimum of a 2-foot boundary between unlike allergens and/or non-allergenic products within the storage racks/bays.

b. The risk of contamination through the usage of on-site chemicals

Processes shall be in place to manage the use, storage and handling of chemicals when used typically on-site to prevent chemical contamination. These shall include as a minimum:

- i. a list of chemicals for purchase, approved by Cargill
- ii. availability of material safety data sheets and specifications confirmation of suitability for use
- iii. avoidance of strongly scented products
- iv. the labelling and/or identification of containers of chemicals at all times
- v. a designated storage area with restricted access by authorized personnel
- vi. use of chemicals by trained personnel only

c. Medicated feed

Medications shall be stored in a dedicated room or area dedicated for such purpose. Access to medications shall be restricted to authorized personnel. Products shall be protected from unauthorized and unsafe medication cross-contact.

Use of dedicated equipment/lines, physical cleaning, flushing, and sequencing are examples of procedures used alone or in combination to prevent cross-contact.

d. Mineral oil risk


Control shall be put in place to manage the use, storage and handling of lubricants and special fluids (thermal heating fluid, grease and etc.) to prevent mineral oils contamination. These shall include the following actions:

- critical lubrication/fluid points in the plants are identified and clear procedures for the correct management of the lubrication/fluid systems are in place to prevent/minimize leakages/contact.
- avoidance of strongly scented products
- in all critical lubrication points, only food grade lubricants are used (i.e., lubricants suitable for incidental contact with food or lubricants for direct food contact). Remark: equipment in the production chain requires proper lubrication to operate at optimum performance and reliability. In specific cases where no food grade lubricant with high quality could meet the particular lubrication requirements of an equipment, a technical solution should be found to avoid leakage/contact a designated storage area with restricted access by authorized personnel.
- fluids used in indirect heating systems have a potential to incidentally contaminate vegetable oils, reason why it is required to use steam in processing installations.
- leakage of diesel or lubricant from the transport vehicles and the machineries shall be reported and recorded. Investigation shall be done appropriately to ensure the risk of mineral contamination in the stored products is low.

5.3.9. Site Security and product defense

Site security shall ensure product safety and integrity and the company shall have documented site security procedures.

A site-specific documented risk assessment (threat assessment) shall be undertaken to identify any potential risks to the security of products held on the premises in storage and appropriate controls shall be implemented. The assessment shall be reviewed at an appropriate frequency, upon agreement with Cargill. It shall also be reviewed whenever:

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- a new risk emerges (e.g., a new threat is identified)
 - an incident occurs, where product safety or quality is implicated
1. At all times facilities shall be access restricted, secured by locking doors or using electronic access. Access to the site by employees, contractors and visitors shall be controlled.
 2. Warehouses shall maintain a visitor/contractor/driver log to clearly identify anyone entering the facility.
 3. Visitors and contractors allowed access to the floor shall be escorted at all times, unless a written program is in place to appropriately manage unescorted contractor access.
 4. All product and documentation shall be physically secured, to assist in preventing internal/external theft or tampering.
 5. When personnel are terminated or leave the company, the warehouse shall maintain a secure facility by assuring keys are returned or codes are changed to prevent their re-admittance. Internally, ensure communication of terminated employees is shared with necessary warehouse staff.
 6. Any relevant incident shall be communicated either to the designated Cargill Warehouse Lead or Food Safety, Quality & Regulatory (FSQR) contact ensuring product safety status.

5.3.10. Documentation requirements

The company shall document procedures and processes to demonstrate compliance to this manual. It shall ensure that all documents necessary to demonstrate the effective operation and control of the processes underpinning this compliance are in place.

The company shall maintain records to demonstrate the effective control of product safety, legality, and quality. The records shall be legible and genuine, and retained in good condition for an appropriate defined time period.

5.3.11. Management of subcontractors


Where activities are subcontracted, the subcontractor shall be required to work in accordance with the relevant requirements of this manual and the relevant legislation. Cargill shall be informed in case of subcontracts.

A contract or written agreement shall exist with all subcontractors, which shall, on the basis of risk define requirements for the safe handling, storage, and transport of products (e.g., temperature range, special handling requirements, product security, segregation of incompatible products, vehicle type).

5.3.12. Product fraud – Economically Motivated Adulteration

The warehouse shall ensure that systems are in place to minimize and mitigate the risk of economically motivated adulteration, defined as fraudulent, counterfeiting, mislabelling, intentional substitution, or addition of a substance in a product for the purpose of increasing the apparent value of the product or reducing the cost of its production, i.e., for economic gain.

A fraud vulnerability assessment plan shall be drawn up and kept under review to reflect any changing circumstances that may alter the potential risks.

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5.3.13. Compliance to certification standards

If materials are subject to particular certifications requirements, such as EFISC-GTP, organic, dietary, non-GMO, Kosher, Halal etc., a separate agreement with Cargill FSQR is needed to document the additional duties of the third-party Warehouse to ensure the applicable certification standards are met.

5.4. Facility operational program requirements

5.4.1 Product Handling

Product handling and movement shall be carried out to minimize the risk of product damage. Personnel shall be aware of any products requiring specific handling conditions and be trained in appropriate procedures. The procedures shall include, as appropriate:

- instructions for handling different product types
- segregation of products including organic material where necessary to avoid contamination (physical, chemical, microbiological, or allergen cross contamination)
- specific handling requirements to prevent product damage

The loading and driving of vehicles or shipping containers shall be carried out in a manner which prevents damage, respecting maximum safe speed and loads shall be secured to prevent movement during transit. Where products are repacked onto pallets for storage or further distribution, the packing configuration shall prevent the risk of damage (e.g., overhanging cases). Where required, repacked pallets shall be band-wrapped to prevent damage in storage or distribution.


Food grade materials shall be stored and transported separately from product for sale as feed or for technical usage. Exemptions to this requirement shall be approved by Cargill FSQR. This requirement does not apply to food grade materials which are labelled or designated for use as food as well as other non-food applications (feed, cosmetic & personal care, technical etc).

Where sampling is included in the warehouse and distribution agreement with Cargill, the warehouse shall follow the agreed and defined sampling procedure(s) including proper sealing of the sample. It shall be carried out by trained personnel. In the event of sampling of Cargill products by the local authorities, retained samples shall be properly stored and managed by the warehouse. Cargill shall be immediately notified.

5.4.2 Loading and Unloading of Goods

Goods acceptance procedures shall be in place to ensure products are within loading/unloading specifications before acceptance. Where specific measurable conditions, such as temperature, are critical to the safety, legality, quality or integrity of products, processes shall be in place to ensure requirements are fulfilled before acceptance.

There shall be a procedure for inspection of loads on arrival to ensure that products are free from pest infestation, visual contamination or damage and are in a satisfactory condition. Procedures shall also be in place to ensure that the loads or products have been held under secure conditions before acceptance.

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Each warehouse distribution facility is responsible for ensuring product being shipped to Cargill customers is loaded into transport vehicles which are in good condition.


1. Less-than-truckload (LTL) trailers shall be locked with no evidence of tampering.
2. Upon receipt of product or materials, the full truckload trailer shall be sealed with no evidence of tampering. Seal numbers shall be compared to assure they match documentation. If not, immediately notify Cargill's warehouse contact to determine disposition of product.
3. Warehouses shall have an incoming trailer/load inspection program to review for, but not limited to damage, dirt, infestation/pest activity or other insanitary conditions.
4. Warehouses shall have a process to inspect product prior and during unloading for damage, evidence of pests, trailer condition, strong odours, etc.

Note: All damages shall be identified and photographed upon receipt. Notification of damages after receipt date may result in the warehouse's expense.

- a. Examples of non-conformances include, but are not limited to: lack of seals, damage, spills, wrong product, shortages, and presence of unexpected items, foreign matter, chemicals, pest infestation, odours, unacceptable trailer conditions, etc. If issues are seen when opening a trailer, do not proceed with unloading, but notify Cargill appropriate personnel immediately.
- b. Damaged product shall be removed from the pallet(s). If agreed upon with Cargill, damages shall be reworked under the agreed upon terms or put to inedible/waste and not shipped directly to Cargill's customers.
5. Receiving BOL/packing list shall be reviewed to assure that they indicate the batch code(s) on all incoming materials, and that these batch codes match the product in the trailer. If there is an inventory documentation procedure in place, follow the defined process.
6. Shuttle Trailer Receiving Requirements:
 - a. Dedicated Trailer Shuttles – verify seal / padlock is intact, that no tampering occurred, and there were no issues with the trailer contents from the Cargill location, document and unload the trailer. If there is an issue with any of the indicated items, contact Cargill immediately and report findings.
 - b. Non-dedicated Shuttle Fleet – warehouse shall follow items 2–5 above.
7. When handling product, care shall be taken so that damage to product does not occur when removing it from trailers.

5.4.3 Storage of Product and materials

1. All pallets stored at the warehouse shall be accessible by at least one side of the pallet to adequately review label information.
2. A defined amount of space shall be left between the wall and the products/materials to allow for proper pest control and facilitate cleaning. This zone shall be free of debris. It is recommended to keep distance between products/materials and wall as well as between pallet stocks.
3. Product shall be stored by type utilizing agreed upon stacking arrangements.
4. Where pallets are stacked, a barrier shall be present between each layer of pallet, when needed to protect the lower pallet.
5. Wooden pallets shall meet International Standards for Phytosanitary Measures No. 15 (ISPM 15) should not be stored outside. Pallets and skids shall be kept in good condition.
6. Cargill's food grade materials shall only be stored in storage facilities which meet all applicable food (hygiene) legislation.

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5.4.4 Vehicle Operating Standards

1. The load-carrying area shall be free from loose items, damaged panels or projections which could present a risk of damage to products.
2. The load-carrying area shall be maintained in a suitable condition to prevent the ingress of rain or dampness during transport where the product is vulnerable to weather damage.
3. The load-carrying area shall be maintained in a condition which facilitates ease of cleaning.
4. The load-carrying area shall be inspected prior to loading to ensure it is fit for purpose. This shall ensure that (as a minimum):
 - it is in a clean condition
 - the walls, ceiling and floor are in a good condition, with no exposed insulation
 - no false walls are in place and the door seal is intact
 - there is no evidence of pests or pest activity
 - the drain holes (if present) are clean and designed to prevent pest entry
 - the polar/strip curtains (if present) are clean and intact
 - the internal lights (if present) are intact
 - it is free from strong odours which may cause taint to products
 - it is free from excess humidity which may cause growth of mould

Records of inspections shall be documented and retained.

Rear door shutters and tail lifts (where fitted) shall be in good working order.

Leakages (e.g., food/non-food grade spilled oil, electric fluids) shall be avoided and leakage inspections at appropriate frequency are necessary. This applies also for warehouse physical locations as well as in the event of barge operations with the use of wheel loader.

5.4.5 Calibration and Control of Measuring and Monitoring Devices

Requirements for environmental control (e.g., temperature, humidity) which influence product quality and product safety shall be defined and implemented.

Measuring equipment used to monitor environmental conditions and product safety shall be in place and identified. Storage areas shall be at the appropriate temperatures for the specific products being stored.


The identified measuring equipment shall be calibrated and adjusted, or its accuracy verified.

This shall include, as a minimum:

- a documented list of equipment and its location
- an identification code and calibration due date
- prevention from adjustment by unauthorized staff
- protection from damage, deterioration, or misuse

The warehouse shall check measuring and monitoring devices at a predetermined frequency based on risk assessment and, where necessary, adjust the devices to ensure accuracy within agreed parameters.

Procedures shall be in place to record the actions to be taken when the prescribed measuring devices are found not to be

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operating within specified limits. Where the safety or legality of products is based on equipment that is found to be inaccurate, action shall be taken to ensure that there is no product safety risk and Cargill shall be notified to agree actions (where appropriate).

5.4.6 Product release - Non-Conforming Product Disposition

The warehouse shall ensure that product is not released unless all release procedures have been followed. Where products require positive release, procedures shall be in place to ensure that the release does not occur until all release criteria have been met and the release has been authorized. Records shall be retained.

The warehouse shall ensure that any out-of-specification product is effectively managed to prevent unauthorized release. There shall be procedures for managing non-conforming / on hold products. These procedures shall include identification of product, requirements of storage, responsibilities, and records. Cargill shall be informed when an incident occurs that may put the safety or quality of their product at risk.

1. For Cargill stored products, non-conforming product shall be segregated from conforming product. To ensure non-conforming product is not inadvertently mistaken for conforming product, two forms of identification for all on hold product is required.
 - i) Physical identification - placards shall be affixed to the outside of stretch wrap stating the hold status of the product. Placards shall be placed on all four sides of the pallet and when not feasible at least in 2 sides. Product shall not be shipped to a customer with placards still adhered to the pallet. Placards shall not be removed without written Cargill approval.
 - ii) Electronic identification – the product shall be electronically identified as “hold” product within the 3PLs ERP or documented system.

Damaged bags/ boxes and spilled/exposed product shall not be shipped and shall be reworked or disposed of properly. Product disposition shall be clearly documented.


2. Returned Materials Authorization (RMA) process shall be followed any time product is returned from the customer. Product shall be evaluated by Cargill any time there are returns of Cargill product from the customer.

5.4.7 Complaints Handling

The warehouse shall have a system for the management of complaints and complaint investigation regarding products and/or services provided.

All complaints shall be recorded, adequately assessed, and investigated, where required. The results of any investigations shall be documented. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively, and records shall be retained. Communication on the investigations and corrective action plan may be required by Cargill.

5.4.8 Incident Management and Business Continuity

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Any delay, rejection, complaint, concern, or other problem or exception that occurs during the normal processing cycle shall be reported immediately to the Cargill warehouse contact. The company shall have procedures in place to identify and effectively manage incidents, including contingency planning to enable business continuity in case of major incidents which may affect the operation.

Procedures shall exist to ensure that product put at risk by an incident is held pending further investigation and/or samples retained where necessary.

Cargill shall be informed when an incident occurs that may put the safety or quality of their product at risk. The procedures shall include, as a minimum:

- identification of key staff constituting the incident management team and their responsibilities
- an up-to-date list of key contacts (including out-of-hours contact details)
- a communication plan, including the provision of information in a timely manner to Cargill, and where appropriate, regulatory authorities.

5.4.9 Management of Product Withdrawal and Product Recall

The company shall have effective documented procedures to facilitate product withdrawals and product recalls. This shall include, as a minimum:

- identification of key personnel who constitute the withdrawal and recall management team, with clearly identified responsibilities
- an up-to-date list of key contacts (including out-of-hours contact details)
- a communication plan including the provision of information to customers and regulatory authorities in a timely manner, as appropriate
- a plan to handle the logistics of product traceability and packaging, recovery or disposal of affected product, and stock reconciliation
- a plan to record timings of key activities
- a plan to take and retain samples for testing, where appropriate
- a plan to conduct root cause analysis and implement ongoing improvements to avoid recurrence


The product recall and withdrawal procedures shall be tested at least annually to ensure their effective operation. All records supporting the recall data and results of the test shall be retained. The accuracy and efficiency of these tests shall be agreed with Cargill.

5.4.10 Order Processing


Unless other arrangements have been provided in writing, all orders will be transmitted from ERP or from the Warehouse Contact to the 3PL. All 3PLs are required to maintain copies of the BOLs/Order information on file for an agreed time period with Cargill.

5.4.10.1 Processing Outbound Shipments

1. Product Pre-Shipment Inspection shall be conducted to assure product is in good, shippable condition:

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- a. When fulfilling a Cargill order, a primary and secondary inspection shall be completed to verify material, batch number, and quantity are correct. This information shall match the pick ticket.
- b. The product that is prepared for shipment shall be inspected for cleanliness, damage, and evidence of pests (including torn bags, crushed or torn cases, fractured blocks, collapsed pallets, etc.). The inspection shall be documented.
- c. If applicable, check product to assure it meets shelf-life requirements, if not otherwise communicated by Cargill.
- d. Follow all noted shipping instructions.
2. Trailers shall be inspected, and inspections documented for each outbound load prior to loading.
 - a. Inspection policy and previous load requirements shall be communicated with all carriers. Policy shall ensure there are no residual materials or adverse trailer conditions that may compromise the product.
 - b. Previous loads and cleaning certificates shall be verified, where applicable.
 - c. The trailer inspection conducted prior to loading shall review a minimum of; absence of foreign material (glass, metal filings, blood, grease, etc.), debris, holes, protruding objects or trailer damage that can compromise the product, or any odours, insects and their nests, rodent droppings, feathers, spills, or moisture. Any findings during inspection shall be clearly documented and photographed (if possible), the trailer rejected, and appropriate actions taken to restore cleanliness and/or repair of the trailer prior to loading. The Cargill warehouse contact shall be contacted.
3. Carrier shall ensure product is adequately loaded and necessary paperwork has been obtained prior to leaving the warehouse. The carrier shall follow Cargill transportation contracts to ensure product integrity is maintained during transit.
4. The Bill of Lading (BOL) shall contain accurate batch code date and quantity information for the shipment.
5. The facility shall maintain a First-Expired-First-Out (FEFO) and First – In – First- Out (FIFO) rotation system for all Cargill products unless otherwise instructed. An effective system shall be in place for identifying the location of stock within the storage area to facilitate stock rotation. Product shall be handled with due regard to the stated shelf life and shall be in compliance with the minimum specified shelf life on delivery where this is specified by Cargill. In case of product returns, FEFO rotation system shall be taken into consideration.
6. Warehouse is responsible for adhering to directed picks based on the Enterprise Resource Planning (ERP) system, Cargill Warehouse Contact direction, or customer specific loading/shipping instructions. In the event the correct batch cannot be located, it is the responsibility of the 3PL to notify Cargill’s warehouse contact. The warehouse will then have 24 hours to locate the missing product.
 - a. Examples of Special Instructions:
 - i. Limited number of batch code dates per shipment.
 - ii. Certificate of Analysis requests.
 - iii. Specific delivery times.
 - iv. Special placarding/bar codes
 - v. Pallet quantity or stacking requirements, etc.
 - b. A legible Driver Signature shall be obtained on the BOL.
7. Seal Requirements:
 - a. All outbound shipments shall be sealed with a tamper evident seal regardless of whether the order is food grade or not. The only exception is Less Than Truckload (LTL) shipments where a padlock or other locking device may be used in lieu of a tamper evident seal.

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- b. 3PL warehouse personnel shall apply the seal in the presence of the driver.
- c. Multiple stop truckloads are to be sealed or locked at the time of shipment. The carrier is responsible for resealing or locking the load after the initial and subsequent deliveries are made.
- d. In a drop trailer situation either leave the trailer secured at the warehouse dock or seal trailer before moving it to the yard.
- e. Record the seal number on all documentation for both the driver's and warehouse records and retain a copy signed by the driver.
- f. Seals shall be held in a secured area (not available to drivers or other individuals).

Note: If trailers are not sealed, the warehouse may be held liable for the entire contents of the unsealed trailer.

5.4.11 COA (Certificates of Analysis) Requirements

Follow ERP and/or warehouse contact pick list instructions regarding requirements for COAs/ COC or other specific customer notification documents for all customer shipments. Note, many COAs/ COC or specific customer notification documents are sent electronically by Cargill whenever possible. If there is an issue generating a COA automatically, please contact the appropriate warehouse contact for assistance.

5.4.12 Traceability Requirements

The warehouse shall have a system of traceability with the ability to trace products throughout receipt, storage, packaging, and dispatch where applicable distribution and vice versa at all times.

Warehouses shall be able to trace all product and packaging through the warehouse and provide accurate inventory, as requested by Cargill. Product shall be able to be traced at a minimum by the following pieces of information: order numbers, product code(s), batch/lot number(s), pallet number(s) and product status (list of on-hold products shall be available) and if applicable, the number of bags from each pallet. Full traceability should be achievable within 4 hours, and where not justification for the longer traceability should be provided to Cargill FSQR on request.

5.4.13 Inventory Records


Each warehouse distribution facility shall maintain accurate records that clearly depict the flow of inventory into and through each facility. Inventory records shall be maintained daily and shall clearly reflect the quantity on-hand at any point in time. Inventory records shall also be retained for a minimum of one year after the reconciliation of the annual physical inventory.

5.4.13.1 Inventory Data Requirements

Although each warehouse distribution facility may have a unique system of recording inventory transactions, the following data requirements shall be included as a minimum:

Receipt of Product:

- 1. Date received
- 2. Product description

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3. Amount received
4. Material number
5. Inbound reference number/Stock Transfer Order (STO)/Freight Order Number/Purchase Order (PO) Number
6. Batch/lot number
7. Product temperature and/or condition
8. Storage location
9. Quantity received of each particular product per batch/lot

Customer Shipments:

1. Date
2. Customer name and if applicable customer address
3. Sales Order Number, Freight Order Number, etc.
4. Product description
5. Material number
6. Batch/lot quantity
7. Batch/lot numbers and number of bags/boxes/units from each pallet shipped
8. Carrier
9. Temperature controlled loads shall have product and reefer temperatures recorded.

5.4.13.2 Month End Reporting

Inventory reconciliations are required as agreed upon with Cargill. A listing of current inventory balances (as of month end) and activity shall be forwarded to Cargill’s warehouse contact. The inventory report shall reflect the following at a minimum: Material number, description, batch/lot, and quantity. Based on the inventory reconciliations, any deviations of material/ batch inventories shall be investigated and corrected. The frequency defined for inventory reconciliations is monthly unless alternative frequencies are contractually defined.

5.4.14 Record Retention

All shipping and Cargill related information shall be retained according to Cargill’s Record and Information Management Policy (RIM). For defined Cargill requirements, contact the Cargill warehouse contact in the region where the 3PL warehouse is located. In some regions, local or country laws shall be followed, if retention requirements are longer than Cargill’s requirements. The records shall be legible and genuine.


The warehouse shall retain the following records for a minimum of five (5) years (or for the duration of the shelf life if it exceeds 5 years):

- a. Batch/ Lot Arrival Cards/records
- b. Batch/ Lot Shipment Cards/records

By way of derogation from paragraph 1 above, materials products subject to the application of the EU REACH Regulation 1907/2006 shall be retained for a period of 10 years.

5.4.15 Audit Program


The warehouse shall collaborate in the Cargill FSQR/PSQR warehouse audit program and execute on the audit action plan. Cargill or third-parties designated by Cargill may periodically conduct an audit or inspection of the Warehouse. Such audits

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shall include product safety and warehouse inspection audits ensuring compliance to these requirements.

The warehouse shall provide Cargill or its third-party designee conducting the audit or inspection with reasonable assistance including, without limitation, access to buildings, appropriate personnel and workspace.

1. The purpose of such inspections shall be to:
 - a. Determine warehouse's compliance with all applicable Hygiene and other laws and regulations and Cargill requirements
 - b. Determine the acceptability of the warehouse as a storage facility or distribution centre for Product; and
 - c. Verify inventory counts and condition of Product.
2. Cargill may conduct periodic audits of product to determine current quality preservation. Stock inventory status may be altered by the results of the inspection.
3. Cargill may perform unannounced inspections at any reasonable time to determine the warehouse's compliance with the requirements described in the manual as well as the day-to-day operational performance of the warehouse with regards to sanitation, sampling procedures and inventory.
4. Cargill's audit, inspection, or failure to conduct any such audit or inspection, will not release warehouse from any of its obligations.

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Annex – Specific FSQR warehouse requirements

Annex A: Specific FSQR warehouse requirements applicable for Agricultural Commodities

1. Goal

The objective of these guidelines is to define the conditions relating to the handling and/or storage of raw materials belonging to Cargill. This document is an appendix to the handling contract established between Cargill and the 3PL (service provider). It is recommended to be reviewed regularly, upon alignment with the designated Cargill Warehouse Lead or Food Safety, Quality & Regulatory (FSQR) contact.

2. Scope

This is applicable to all service providers to whom Cargill handovers the unloading/loading services of its ships, barges, trucks, and trains as well as the storage of its raw materials. The raw materials concerned are typically considered as the following (but may include any agricultural commodity and its co-products obtained through initial processing such as crushing and milling): oilseeds, cereals, crude oils, meals, hulls, germs. These commodities may have particular specificities which will be subjected to detailed requirements: “organic,” “conventional,” “GMO”, “non-GMO”. Not all of the section is applicable for the warehouse, so there will be sections “mandatory,” and section “recommended.”

3. Procedure


The service provider is responsible for the goods entrusted to it by Cargill. It undertakes to manage all flows while preserving the interests and properties of Cargill products.

3.1 Regulatory Requirements (Mandatory)

The service provider will comply with the requirements of all applicable regulations in force in terms of handling, storage and delivery of the products covered by the contract. The service provider will comply with the requirements of the regulations in force relating to the product quality and safety of the products covered by the contract.

Specifically, for EMEA region, the basic regulations are the:

- Regulation 183/2005/EC establishing the requirements in terms of animal feed hygiene, in particular, the need to register the site with the competent authorities (Article 9 and 10).
- Regulation 178/2002/EC establishing the general principles and general requirements of food legislation, establishing the European Food Safety Authority and laying down the procedures relating to food safety.
- Regulation 852/2004/EC on the hygiene of foodstuffs.
- Regulation 2017/625 on official controls carried out to ensure compliance with feed and food legislation and with animal health and animal welfare provisions.
- The service provider undertakes to comply with any new regulation inherent in its scope of action.
- The service provider undertakes to comply with the local – country regulation in case it is more restrictive than the EU regulation.

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3.2 Certification

Cargill would like to work as much as possible with certified service providers. In the event that the service provider does not have a valid certification, it shall sign and implement all the mandatory sections of this term sheet to start the cooperation. The service provider acknowledges that it is one of the actors concerned by the scope of certification of its client.

	Standard flow	Flow under EFISC/GTP or GMP+ certification
Quality certification	Recommended	Mandatory
Scope adapted to the product stored for	handling, transit, storage	handling, transit, storage
Certifications recognized	EFISC-GTP, GMP+, Feed Chain Alliance, QS AIC-FEMAS-TASCC-UFAS, CSA-GTP (only for grain and oilseed storage- for feed this shall be clearly mentioned on the scope)	EFISC-GTP, GMP+, Feed Chain Alliance, QS AIC-FEMAS-TASCC-UFAS, CSA-GTP (only for grain and oilseed storage- for feed this shall be clearly mentioned on the scope)


3.3 Visit(s) and service provider evaluation (all section mandatory)

The service provider agrees to allow the access to its premises to any agent or representative of Cargill at any time. Likewise, he undertakes to notify Cargill of any visit that may take place in the assigned storage area of Cargill products.

3.3.1. Insurance & FSQR Audits

Cargill reserves the right to carry out an assessment of the service provider via audits with the aim to assess the service provider's ability to comply with the regulations in force as well as the specific requirements of the customer. These audits should be carried out if applicable before any first operation aimed at unloading, storage and delivering the goods concerned by the contract.

	Insurance audit value stored <2 million USD	Insurance audit value stored >2 million USD
Conditions	A qualified Cargill employee can carry out the part of the inspection for which he/she is qualified. Other part of inspection should be done by an approved external entity inspection.	An external entity inspection is appointed for the inspection.
Scope of audit	Outside storage policy	

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Conclusion	In the event that the result of the inspection is not conclusive, a study can be carried out to assess the possibility of temporarily approving the handler. An action plan shall be submitted and approved by Cargill and allow the resolution of discrepancies within a reasonable time frame. A new inspection may be carried out within 6 months of the first inspection in order to verify the effectiveness of the corrective actions implemented.
Frequency	More or less every two years.
	FSQR audit
Scope of audit	The service provider's quality system is audited by the Cargill FSQR team or an approved external entity. The audit will be the subject to a report stipulating the recommendations approved by both parties. The service provider agrees to carry out the implementation of the corrective actions required in accordance with the deadline established by the audit reference system.
Conclusion	If the result of the inspection is not conclusive, a study can be carried out to assess the possibility of temporarily approving the handler. An action plan shall be submitted and approved by Cargill and allow deviations to be resolved within a reasonable time. A new inspection may be carried out within 6 months of the first inspection in order to verify the effectiveness of the corrective actions implemented.
Frequency	Based on the risk assessment and the volume stored.


3.3.2 Visits (mandatory)

The service provider will inform Cargill as soon as possible for any inspection (National authorities, customs, etc.) carried out on the products stored by Cargill and where Cargill product is sampled ensure that the retained sample issued by the inspection is sent to Cargill. More generally, the service provider agrees to communicate to Cargill the results of control or inspection relating to other products stored in its stores, if these results may create any risk of related to food safety, alteration, degradation, or any other phenomenon likely to cause harm to Cargill, their products, or its customers.

3.4 Quality System

The service provider has established a quality manual which is made available to Cargill and auditable by Cargill or a third-party. Any subcontractor or affiliate of the group shall have the same level of certification.


Content	Requirement	Mandatory/ Recommended
Traceability	The service provider has established a traceability system which guarantees that adequate means of identification are put in place at warehouse level and that the following traceability elements need to be available in less than 4 hours and sent in Excel format with:	Mandatory

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	<p>The name of the customer - The address - The tonnage - The delivery date -The SAP nomination number - The transport company - The plate numbers- The place and the loading cell</p> <p>Trained employees available any time.</p>	
HACCP	<p>The service provider should implement a HACCP study and should develop all actions resulting from the diagnosis of said study. Example: Non-cross contamination of the product with other raw materials.</p> <p>If in place, the risk assessment resulting from the HACCP study will be subject to an annual review at least. The risk assessment will be systematically reviewed during any structural and/or organizational modification, requiring it.</p>	Recommended
Crisis Management	<p>The service provider shall have a crisis management procedure. He shall carry out a test of this procedure at least every year to ensure that the crisis management contacts and the procedure itself remain up to date.</p> <p>Cargill reserves the right to organize a traceability exercise.</p>	Mandatory
Incident management	<p>The two parties undertake, as of now, to make every effort to remedy the incidents, anomalies, errors observed and agree to designate, each, for this purpose, one (of) quality representative(s) who will be) responsible for reporting to their respective representative(s) the necessary improvements or modifications.</p> <p>The service provider agrees to address the non-conformities received from Cargill within a maximum period of 15 working/calendar days and to provide corrective action(s) to the problem.</p> <p>In the event that notification to the competent authorities is necessary, this will be made by Cargill.</p>	Mandatory
Training	<p>The service provider undertakes to ensure that all employees are trained in food safety and the management of raw materials in storage.</p>	Recommended

3.5 Storage

The products entrusted by Cargill to the service provider are raw materials. Dry bulk materials shall be stored in a dry, clean, ventilated, closed and secure building(s), they should also be preserved from water entry, insects, rodents, birds, and other pests. The service provider is responsible for the integrity of the batches and the segregation of the different qualities of goods in the cell. It undertakes to keep, with care, diligence and in compliance with applicable legal requirements, the products stored in its warehouses/tanks from unloading operations to delivery to factories or to Cargill customers. He also needs to ensure that "zero" point are done regularly and recorded.

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The service provider is responsible for the sanitary condition of the cells/ tanks before storage. All precautions shall be taken so that:

- Storage facilities and handling systems are strictly clean and tight.
- The procedures and quality controls are appropriate and correspond to Cargill requirements and the quality standards in place.
- In case food/feed safety analyses need to be carried out on Cargill products; the service provider shall first obtain the approval of Cargill to launch the analyses.
- Guarantee the absence of any cross-contamination by storage plant protection products and biocides, particularly the appropriate equipment (dosing pumps, nebulizers, anti-siphoning nozzles).
- Ensure the implementation of a pest management system:
 1. In accordance with the regulations in force
 2. By a qualified service provider holding the appropriate license
 3. Guaranteeing the absence of toxic bait in the storage cells.

Any presence of allergen product stored shall be notified to Cargill to allow an assessment of the cross-contamination risk.

The service provider is not authorized:

- **To apply a fumigation and/or phytosanitary treatment to Cargill products without prior agreement.**
- **Store oilseeds in cells that have been treated with phytosanitary products.**
- **To store oilseeds on bitumen to avoid any contamination by Polycyclic Aromatic Hydrocarbons.**

3.5.1 Temperature management (mandatory)

Low temperature is an important factor when it comes to avoiding insects and generally preserving the nutritional quality of stored products. The service provider agrees to carry out temperature monitoring by fixed or mobile thermal probes at regular intervals ideally on daily/weekly basis and to communicate the readings to Cargill in case unusual rise of the temperature happened.

Temperature data is sent in a way that helps identify hot spots in storage if there are any. The maximum and minimum temperatures for the batch are mentioned in the document.


Cargill shall be notified when:

- The batch temperature is above 25°C when the ambient temperature is below 25°C.
- The batch temperature is above 30°C regardless of the outside temperature.
- Two days in a row, the temperature increases by more than 1°C.
- The service provider thinks there is a risk in the stability and/or quality of the product.

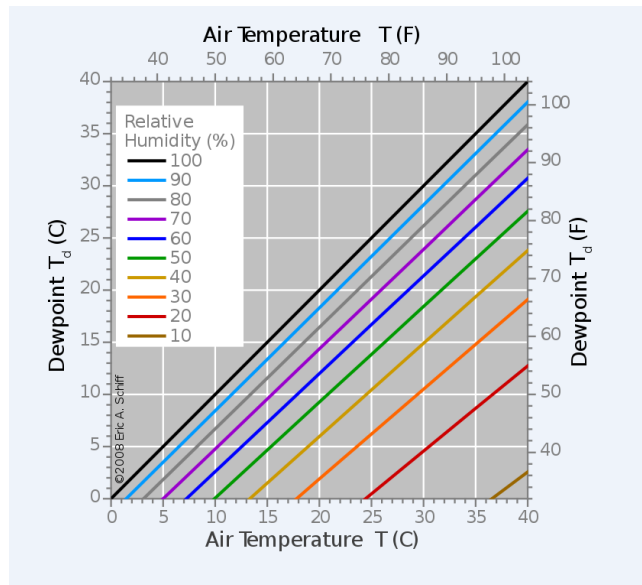
3.5.2 Ventilation (recommended)

When available ventilation could be needed to achieve the right temperature of storage to avoid insect infestation and to ensure the quality of the stored goods. Ventilation can be used to lower batch temperature. However, it shall be done under conditions that avoid the creation of condensation:

- Use the temperature/relative humidity/dew point graph to determine the best ventilation conditions.

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- If the temperature difference between the grain and the ambient temperature is greater than 10°C, the ventilation shall be validated with Cargill.



3.5.3 Moisture management (mandatory)

Storing grain with a humidity level below or equal to the limits established by the contractual specification on moisture is an essential condition to avoid damage from microorganisms and insects.


3.5.4 Management of insects on the raw material (mandatory)

If the service provider identifies the presence of insects in the stored plot, it shall immediately notify Cargill and share the following information with them:

- The number of insects per kg,
- The type of insect found,
- In which commodity were these insects found?
- Is there a risk of transmission of contamination to neighbouring cells?
- Have this parcel been subject to prior treatment with pesticides?

Then it should agree with Cargill on the curative treatment if needed:

Curative treatment	Fumigation with phosphine	Phytosanitary treatment	Physical sorting
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Process	<p>The Service Provider shall send:</p> <p>The complete fumigation report with the mention of the fumigant applied the concentration, the recommended exposure time, and the real time of application.</p> <p>After ventilation, the fumigation company's report stating that the gas level is compliant and safe to release the goods can be released on the market.</p>	<p>The service provider shall validate with Cargill before application:</p> <ul style="list-style-type: none"> - The product used -The concentration used -Sending a report detailing the processing methods. <p>Reminder, it is forbidden to treat oilseeds or their by-products with a phytosanitary product.</p>	<p>The service provider uses a sieve with small diameter to remove the insects.</p>
After treatment	<p>Ensure the post-processing follow-up of the batch via regular visual checks and rigorous monitoring of temperatures.</p>		

3.5.5 Storage plan and description (mandatory)

The service provider communicates to Cargill a storage plan which mentions:

- The general plan
- The conveying system

The service provider shall make available to Cargill:

- The 3 previous products stored of the cell, to be noted only the products mentioned in the International Database Transport for Feed (IDTF)
- The description of the cleaning protocol carried out by cell.

Any modification of the initial storage plan, such as mixing of products and/or transfer of goods from cell to cell, shall be the subject of a written request sent to Cargill, and will be carried out only with the agreement and written authorization of Cargill.


In case of mixtures in a cell which may be those mentioned below, an additional cleaning request may be requested:

- Raw product versus heat treated/cooked product
- Mixture of two different batches of the same product
- Mixture of two different products (e.g., sunflower, and rapeseed / conventional rapeseed and GMO rapeseed)

3.5.6 Cleaning (mandatory)

The service provider ensures that cleanings are carried out and recorded according to the frequency established for:

- Conveyor belts
- Shuttle trucks

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- Pay Loaders
- Ventilation ducts
- The frames
- The elevators
- The port environment (if applicable)


These cleanings are carried out in accordance with the established minimum cleaning regimes, no residue of previous goods stored and/or unloaded and/or loaded shall be present. In the case of the use of a disinfectant and/or a detergent and/or phytosanitary product, the product shall be approved for its use. The commercial name as well as the product data sheet and SDS will be made available to Cargill on request.

The cleaning plans shall be performed in accordance with the stored products (raw/heat treated/cooked product, conventional/GMO). In the event of insect treatment at the premises (cells, conveyor belts, elevators, etc.), it is imperative to keep the record of the service (date and product used). A Disinfection is mandatory in case of detection of salmonella.

3.5.7 Checking of goods

Cargill undertakes to notify the service provider of any modification and development of the characteristics of the products, likely to influence the storage service and the health and safety conditions. Then the service provider can go through the following steps/actions:

Step	Opening of the hold – Before discharge (if applicable)	Reception (if applicable)	During storage (mandatory)
Actions	<p>A visual recognition of the goods is made when the holds and skips are opened during unloading. This may result in the finding of non-compliance.</p> <p>Any non-compliance is the subject of immediate written confirmation of the finding of non-compliance to Cargill and may lead to the stoppage of unloading operations if Cargill considers the non-compliance to be substantial (equipment leak handling, presence of foreign</p>	<p>Following point to be checked:</p> <ul style="list-style-type: none"> - The visual aspect - Flair - The presence of insects - Humidity - Temperature - If the temperature is above 30°C, Cargill should be warned. - A refractometer could check in the case of sunflower unloading to determine whether it is classic or oleic sunflower. 	<p>Notification to Cargill for any modification or development of the characteristics of the products, this by a visual inspection of the stored batch(es) carried out and recorded every month. At a minimum, the control points are:</p> <ul style="list-style-type: none"> - Presence of pests, pest faeces - Compaction of the product - Presence of foreign bodies - Presence of insects <p>If any of the above points is non-compliant, the service provider undertakes to notify Cargill immediately. In the case of the presence of insects, the solutions for managing the problem shall be</p>

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bodies/insects, soiled goods, ...)	validated jointly with Cargill (fumigation, phytosanitary treatments, weevil sieve cleaning, etc.)
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3.5.8 Ambrosia – Control of dissemination (if applicable)

Ambrosia is an annual and common herbaceous plant that grows in cultivation areas, fields, pastures, roadsides, fallow areas, etc. This plant is considered a "weed" because its pollen has a powerful allergenic power for sensitive people, hence the need to notify to target development areas. This undesirable substance regulated under Directive 2002/32/EC is managed due to the application of our processes. A limit of 50ppm has been set in animal feed and if exceeded requires with notification to the competent authorities.

In the event of detection of more than 50 ppm, Cargill (the Nantes origin office) will notify the service provider by email. This email will require that compliance with the following best good practices have to be stringently taken into account:

- Closed storage doors
- Covered truck for wheelbarrowing if applicable
- Regular cleaning of the unloading place
- Cleaning and point zero of the external storage cells at the end of the batch

3.6 Transport & loading of trucks

Transport takes place in compliance with the specific transport regulations, for the provisions relating to health safety. It should be ensured that rain cannot go into the truck holds during transport and unloading. Vehicles, conveyances, and containers shall be maintained in a state of repair, cleanliness, and consistent condition. Bulk products shall be transported in accordance with the best practices of standards such as Qualimat transport.

Transport is the responsibility of the supplier and/or customers, however the service provider should:


- Record previous three loads which shall be approved as previous cargoes.
- Ensure through spot checks that:
- The cleaning applied is consistent with previous loads and in line with IDTF data base – Home International Database Transport for feed
- The vehicle is empty, clean, dry, odourless, vermin-free, and residue-free from the previous load
- Cover the trucks when the goods leave
- Report to Cargill any problem related to the loading operation
- Present cleaning certificates before loading if applicable

4. Management of products with special properties

4.1 Conventional products (mandatory for location having both conventional & GMO products)

The "conventional" character of the products stored on behalf of Cargill shall be preserved for the entire duration of the storage, unloading, and loading of the goods included. The service provider put in place all control measures to avoid cross-contamination between a conventional product and a GMO product:

- Cleaning conveyor belts
- Cell cleaning

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- Cleaning of handling equipment
- Respect of the "zero" points
- If the service provider is storing GMO product, he shall inform Cargill to allow a risk assessment on the potential cross-contamination

If in doubt about potential cross-contamination, the service provider will directly notify Cargill immediately so that Cargill carries out a risk analysis.

4.2 GMO products (mandatory for location having GMO products)

During GMO unloading operations, the unloading dock shall be cleaned in the event of overflow of seeds and at the end of unloading from the boat to prevent their dissemination. The conveyor belts and hoppers shall be cleaned with water at the end of the unloading of the boat and a visual check of cleanliness shall be carried out. A "flush" with compliant goods can be organised, the tonnage and handling methods shall be validated beforehand with a Cargill contact.

Mechanical weeding at the port and docks should be carried out before flowering (ideally in early spring). Proof will be sent to Cargill. The exteriors of storage rooms shall be swept and cleaned in the event of manipulation of GMO seeds outside.

In the event of the transport service (including wheelbarrowing) of GMO seeds, the trucks shall be covered. If the truck arrives uncovered, Cargill will notify the service provider giving the trailer reference so that corrective action can be taken.

The waste generated by the above operations shall be evacuated by methanisation. Verifications of the application of these practices may be carried out by Cargill.


4.3 Organic products (mandatory for organic product)

The "organic" character of the products stored on behalf of Cargill shall be preserved for the entire duration of storage, including unloading and loading of the goods.


The service provider undertakes to store the goods in a certified "Organic" warehouse, no derogation would be accepted. In case of doubt about potential cross-contamination between an "organic" product and a "standard" product, the service provider undertakes to notify Cargill immediately so that Cargill carries out a risk analysis.

5. Specific FSQR storage tank requirements applicable for Crude Oil

- Crude oil shall be stored in a closed tank(s), secure from water entry, insects, and other foreign materials.
- The service provider shall guarantee the absence of any cross contamination the last immediate cargo and the last 3 cargoes shall comply with Fediol code of practice 14COD153.
- Heating of crude oils shall only be done when the service provider receives the instruction from Cargill. The heating operation shall be performed according to the FOSFA heating recommendation.
- Oil storage tanks do normally not require cleaning.
- Cleaning **shall not** be applied as routine day-to-day operation.

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- Cleaning is not necessary if according to Cargill cleaning matrix, the previous cargo is compatible to the next cargo.
- Cleaning **shall** be applied after maintenance works on the interior or if the tanks are idle for an extended period of time.
- It is recommended to inspect tanks at least once a year for presence of sedimentation (waxes, traces of bleaching earth, active carbon, polymerizate, foreign bodies etc.), which will finally pose a risk on quality (for instance waxes in case tank is emptied or just filled). Based on this inspection outcome it should be decided and recorded if or if not, a cleaning **should** be conducted and when a new inspection is required.
- For new tanks, cleaning is part of the commissioning procedure (to remove dirt, welding debris, etc.)

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Annex B: Specific FSQR warehouse requirements applicable for cocoa beans


Apart from requirements described under section 5, cocoa beans warehouses shall comply with the following:

- The floor of the storage area shall be flat and built in concrete. Bitumen/asphalt floor is forbidden as it may contaminate cocoa beans with mineral oils and stones may flake off.
- Thorough cleaning shall be conducted when the warehouse becomes empty and before the reception of new cocoa beans. Outside area of the warehouse shall be clean, in absence of chemicals, shrubs and trash.
- Warehouses shall have measures in place to avoid cross contamination with other raw materials as well as contamination with foreign bodies. The Cargill cocoa beans shall be stored in dedicated areas.
- Stored cocoa beans shall be uniquely identifiable (lot number, origin, location, quantity, organic and sustainability claims if applicable) and measures are in place to avoid mix-up or overflow to and from other piles. Non-retail containers with organic cocoa beans shall show the claimed certifications on the labels and include the last certified handler or inform Cargill's contact when this is not the case.
- It is forbidden to store allergen products in the warehouse. Also, the equipment for the bean treatments shall not be used for handling of allergen products if any would be present else on site. Cargill shall be notified immediately when an allergen (e.g., peanut) is identified during the storage and handling of cocoa beans.
- It is forbidden to apply fumigation to Cargill products without prior agreement. The dedicated fumigation registration form shall be filled in and approved by Cargill FSQR upfront.
- Warehouses shall have ventilation system in place and adequate to ensure cocoa beans dry and free from condensation.
- The temperature inside the warehouse and of the pile shall be monitored at least once a week with calibrated temperature probes. Cargill shall be notified immediately when a heat spot or a smoulder is detected from the pile. Warehouse keepers shall rake the concerned spot to cool down the affected area and dry the cocoa beans.
- Warehouses shall prevent unauthorized machinery and personnel in the area where the cocoa beans are stored.
- Warehouses shall have crisis and incident management procedures. Once a year, warehouses shall carry out a test to ensure that the crisis management contacts and the procedure itself remain up to date.

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Annex C: Specific FSQR warehouse requirements applicable for temperature-controlled products

- Temperature Controlled warehouses refers to any warehouse facility that has refrigerated, tempering and/or freezing areas that store temperature-controlled products.
- The warehouse facility shall provide confirmation of the effective operational performance of freezing, chilling and cold storage facilities. Chillers, blast freezers and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of product and shall be easily accessible for inspection and cleaning.
- Sufficient refrigeration capacity shall be available to store chilled or frozen goods at the maximum anticipated throughput of the product with allowance for periodic cleaning of refrigerated areas. Discharge from defrost and condensate lines shall be controlled, and discharged to the drainage systems.
- The warehouse facility shall have a written procedure for monitoring temperatures of storage rooms including the frequency of checks and corrective actions if the temperature is out of specification.
- Cold and chilled storage rooms shall be fitted with temperature monitoring equipment, located to monitor the warmest part of the room, and be fitted with a temperature measurement device that is easily readable and accessible.
- Records shall be kept of frozen, cold, and chilled storage room temperatures.
- Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g., thawing, slacking, labelling) if applicable, do not pose a risk to product safety or loss of traceability.


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Annex D: Specific FSQR warehouse requirements applicable for pharmaceutical products

- The product shall be stored within prescribed storage conditions meaning that the warehouse facility shall store the product under appropriate conditions of temperature, humidity, and cleanliness to ensure that the product is not adversely affected.
- Specific segregation area for rejected products or non-conformed products should be clearly in place.
- Transport and storage should be conducted in accordance with the relevant GDP and local regulatory requirements.
- Regarding the storage of API (Active Pharmaceutical Ingredients), pharmaceutical authorization by local pharmaceutical authorities should be granted.
- An established QMS, covered by ISO 9001 or equivalent shall be in place. A documented Quality Management System should be in place, including the Quality Risk Management to enable a systematic process for the assessment, control, communication, and review of quality risks to the product stored. GDP compliance: QMS with written procedures should be demonstrated – ideally, GDP QMS should be integrated into the overall quality system.
- Is the legal entity that performs warehousing activities for Cargill holder of current certifications and licenses required by their national authority with regards to APIs and/or pharma products? Copies of certifications including ISO, GDP, GMP, etc. should be shared with Cargill. Is the duration of storage of API at the premises greater than 72 hours? If so, a GDP-certification is required.
- There should be a valid and current written contract with the Cargill entity that owns the goods, specifying the activities that the third-party is being required to provide.
- A Quality Agreement between the Cargill entity that owns the goods and the entity that has the business permit for warehousing should be put in place. Quality Agreement should cover all relevant activities performed by the third-party.
- Cargill should be provided with the contact details of the designated person(s) responsible for 1) all quality-related matters, and 2) regulatory compliance.
- The storage area should have sufficient capacity to ensure orderly storage, appropriate segregation, and correct selection of designated goods to avoid contamination and mix-ups.
- The storage area should have designated area to physically segregate quarantined, rejected, recalled, returned, non-conforming and commissioned products.
- Specific written procedures for the handling of returned or rejected products shall be shared with Cargill.
- Storage conditions (Temperature and Humidity) should be monitored and documented. Monitoring devices should be calibrated.

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- Specific stock rotation should be managed in the warehouse (e. g. FIFO, FEFO). Moreover, a procedure should be implemented to ensure that products that reached their expiry or retest date are separated from saleable stock waiting for decision-making by owner of the goods.
- Electronic warehouse management systems should be validated.
- Traceability: warehouse shall ensure to maintain records such that all significant activities or events are traceable.
- Specific Change control procedure should be implemented in line with Cargill's requirements.
- Specific Deviation and Non-Conformance procedure should be implemented in line with Cargill's requirements.
- Specific Complaint and Recall procedure should be implemented in line with Cargill's requirements.
- CAPA procedures should be implemented: those specifically dealing with API and GDP compliance should be shared with Cargill.
- An internal audit program should be implemented – to be conducted by qualified people trained in auditing and evaluation techniques.
- A Quality Management training programme should be in place.
- At a minimum, the programme should foresee training for new recruiters and refresher training for all employees at least on an annual basis.
- There is adequate number of personnel available in-house or contracted out to perform all operations in compliance with EU GDP requirements. Specific training for key personnel and staff with activities and/or responsibilities for GDP-related activities for APIs shall be demonstrated. All (incl. administrative personnel), involved in handling and distributing API and/or pharma-grade products are formally qualified according to written criteria. There are available personnel qualified for GDP-relevant operations with specific (technical) background/ education {optional}. Individuals' training and qualification records are maintained.
- An internal procedure should be in place to ensure that necessary PPE is provided for handling hazardous materials to give appropriate protection of the personnel.
- Specific cleaning procedure should be implemented.
- Specific building maintenance should be applied to guarantee to avoid pest penetration and high level of hygiene standard.
- Specific pest control procedure should be implemented for rodents, flying insects and crawling insects.
- Product security: specific measures should be in place to prevent unauthorized access to warehouse.

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- Records should be retained for at least 1 year after the expiry date of the product. For APIs with retest dates, records should be retained for at least 3 years after the final product batch is completely distributed.
- Specific procedure should be implemented to describe the visual inspection of the products received in container (packaged or bulk) including its security features (e.g., seals), confirmation of product identity from the label against documentation and recording of these data.
- The warehouse shall be well-ventilated.
- If a heating/ air-conditioning system is installed, it shall be compatible with the stored products.
- There is adequate lighting in the warehouse.
- The design of the air handling system is appropriate to avoid contamination and degradation of products.
- The design, operation, and maintenance of gas utility systems (e.g., nitrogen or compressed air) are appropriate to avoid contamination of products.
- Specific procedure should be implemented to describe the visual inspection of the cleanliness of the vehicle used to deliver products, cleanliness of the goods delivered including its security features (e. g. seals), confirmation of product identity from the label against documentation and recording of these data.
- Any sub-contracting is forbidden but in case of emergency any sub-contractors should be notified to Cargill in advance waiting for formal approval.

7. References

- [Cargill Food Safety Policy Manual, February 2022](#)
- [SQM-SOP-010 Third Party Warehouse Audit & Qualification Requirements](#)
- [Warehouse - Distribution Audit Template 4.2018 Revision](#)
- [FSSC2.5.1 Procedure-Service Providers Management](#)


8. Notes and Attachments

9. Revision History


Version	Date	Summary of Changes
01	September 2023	Extension of scope

10. Author(s) and Contributor(s):

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