



# Food Safety Requirements For Suppliers

Schnuck Markets, Inc.



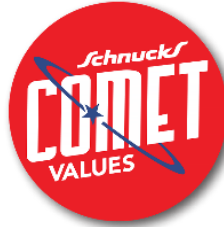
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## Food Safety at Schnuck Markets, Inc.

*We are committed to offering safe, high-quality food by developing and maintaining programs that meet the highest food safety & quality standards. We help minimize risk by enabling a culture designed around processes that are easy to execute, and supporting relevant training and education, in order to provide our customers with safe and affordable food.*



*At Schnucks, our purpose is to Nourish People's Lives - the lives of our customers, our teammates, and the communities we serve. Utilizing our **COMET** values as our guide, we can continue to grow and develop relationships with our customers and each other.*

### **C**ustomer First

*Food Safety provides best in class service to all of our customers in supporting initiatives while maintaining the highest food safety & quality standards.*

### **O**ne Team of Merchants

*Food Safety commits to leading with a team-first mentality, by providing sound subject matter expertise to resolve issues and provide service in execution of goals.*

### **M**idwest Family Values

*Food Safety supports the company and delivers results while maintaining the highest level of integrity. We do things not just because it is the law, but the right thing to do.*

### **E**xecute to Win

*Food safety works in a manner that drives best in class execution through partnerships, providing sound expertise, and striving to do what's best for the teammates and customers.*

### **T**ry New Things

*Paramount to the success of the business, food safety strives to look for and forge new paths of compliance through methodology and technology-driven systems.*



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## Mission Statement

Our mission is to nourish people's lives by ensuring the best products to our customers. We do this by stipulating that all food suppliers conform to all local, state, national, and international regulatory requirements applicable to their product and operations. In addition, suppliers are required to comply with the food safety requirements outlined in this guide. Failure to comply with these requirements can result in termination of approved Supplier status and business may be discontinued immediately.

## Supplier Definitions

As a potential or current supplier of human/animal food and beverage for Schnuck Markets, Inc., specific requirements must be met depending on the type of supplier you are. Supplier definitions are detailed below to provide guidance as to the requirements:

- **OWN Brand – Private Label and Unbranded Suppliers:**
  - A supplier that provides a product that is sold with a “Schnucks” label. Our Own Brand includes products that are made for or sold exclusively to Schnucks.
  - Unbranded suppliers provide products that are sold without a label. This includes products that are offered in self-service, deli, meat and seafood cases.
  - Product that is used as an ingredient for assembly and or further processing by our teams at the store.
  
- **National Brand Supplier**
  - A supplier that provides their branded product to our retail locations as well as other retailers.
  
- **Broker or Distributor**
  - Negotiates and/or sells certain goods produced by third parties (“Product Suppliers”), which includes food (including perishables and canned goods), ingredients for food, food contact substances or packaging and similar items for use/resale in SMI retail stores and/or manufacturing plant.
  - A Broker/Distributor ensures;
    - that its Product Suppliers are compliant with the SMI Food Safety Requirements for Suppliers as well as all applicable laws, regulations, codes and sanctions including those required for food and food ingredients as set forth in the Food Safety Modernization Act Preventative Controls for Human Food (See 21 CFR Part 117).
    - If they are acting as an Importer, that the Company agrees to take required steps to ensure that any food or food ingredient produced outside the United States is imported in compliance with a Foreign Supplier Verification Program of the Food Safety Modernization Act (See 80 FR 74225) and that SMI cannot be listed as consignee or importer of record for any food or food ingredients.



- **Restaurant**

- A permitted establishment that prepares and serves food and/or beverages to customers at or from the establishment. Meals are generally served and eaten on the premises or offered as take-out, food delivery services, or other methods as allowed by the regulatory authority it operates under.

## **Foreign Supplier Verification Program Responsibilities**

Foreign Supplier Verification Programs (FSVP) apply to all imported pet and human food, beverages, and dietary supplements/ingredients (“FSVP Regulated Items”) unless the importer of foreign supplier is exempted by FSMA, or the food product is under the exclusive jurisdiction of USDA. The FSVP Rule requires Importers to verify that its foreign suppliers are producing food that meets U.S. Food Safety standards, i.e., FSMA Preventive Controls and Produce Safety requirements.

Schnuck Markets, Inc. shall not import items that are subject to the FSVP Rule and shall not be listed as consignee, owner or FSVP importer for any FSVP regulated items. In addition, SMI’s Data Universal Numbering System (DUNS) number (s) shall not be used as the unique facility identified (UFI) for FSVP.

When there is a need for sourcing FSVP regulated items, they will be sourced through a U.S. Broker, consignee or other importer of record (IOR) who as the sole responsible party for FSVP, will comply with the rule requirements.

Additional agreements in writing may be required. All necessary evidence of compliance must be available to Schnuck Markets, Inc. (SMI) upon request. If changes occur, all importers, distributors, brokers and suppliers are expected to contact Schnuck Markets Food Safety immediately.

## **3<sup>rd</sup> Party Audits and Certification**

### **Fresh Produce Suppliers**

All suppliers of fresh produce are required to have a food safety assessment, 3<sup>rd</sup> party food safety audit or inspection on an annual basis. The assessment is required to cover operations from harvest to final product regardless if the operation is owned or operated by your company. This includes the following types of operations: farm, ranch, grower, field, orchard, greenhouse, packinghouse, cold storage, processing facility and storage/distribution center. It is the supplier’s responsibility to ensure all operations maintain compliance with Schnucks as well as all applicable State, Local and Federal requirements. Local, State, FDA, and USDA inspections may not be accepted in place of a 3<sup>rd</sup> party food safety assessment.

**Global Food Safety Initiative (GFSI) certification** is preferred yet may be required of certain suppliers of manufacturing operations for the following types of suppliers; Private Label, Unbranded Suppliers. In addition, based on industry product recalls and outbreaks, suppliers of commodities of concern may also be required to obtain GFSI certification at the discretion of Schnucks Food Safety Quality



Assurance. Please visit the following official GFSI website to obtain more information on recognized schemes:

- [mygfsi.com](http://mygfsi.com)

**Harmonized GAP (good agricultural practices) for Produce suppliers.** GAP certification is a USDA audit program through which producers can demonstrate their compliance with food safety requirements to purchasers and retailers. This annual 3<sup>rd</sup> party Food Safety audit can be used in lieu of GFSI certification. More information on GAP certification can be found at:

- <https://www.ams.usda.gov/services/auditing/gap-ghp/harmonized>

**Crop Protection Products** must be used according to registered label directions for target crops and in compliance with US Maximum Residue Limits (MRL) tolerances. For pre- and post-harvest, suppliers must have programs in place to ensure the proper and legal use with agricultural inputs such as pesticides, insecticides, fungicides, herbicides, plant growth regulators, etc. Suppliers under no circumstances should target crops exceed US MRL tolerance levels for crop protection materials or use these materials on commodities in which no tolerance has been established. Schnucks Markets, Inc. has the right to randomly test fresh produce sold at our retail locations. If any product is to be found out of compliance with US regulatory requirements, we may withdraw product from stores and deactivate your vendor number.

**Label Claim Certification** for products with a claim on its packaging, suppliers must ensure that a 3<sup>d</sup> party certification that uses a seal or other description or mark to identify certification for Organic or the Non-GMO Project must provide a current certification upon request. All other marketing or health related claims like gluten-free, must be verified by reliable evidence and available upon request.

**Bioengineered Labeling** addresses the labeling of plant-derived foods with information on whether the food was or was not produced using genetic engineering ingredients. Suppliers are required to notify Schnucks if any of their products are required to be labeled under the Bioengineering Food Labeling Standard and the supplier is required to maintain records of that claim designation. More information on can be found at:

- <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-voluntary-labeling-indicating-whether-foods-have-or-have-not-been-derived>

### **All other Food and Beverage Suppliers**

All suppliers of consumable food and beverage suppliers of human and animal food are required to have a food safety assessment, 3<sup>rd</sup> party food safety audit or inspection on an annual basis. The assessment is required to cover manufacturing operations that process products for Schnucks regardless if the operation is owned or operated by your company. It is the supplier's responsibility to ensure all operations maintain compliance with Schnucks as well as all applicable State, Local and Federal requirements. Local, State, FDA, and USDA inspections may not be accepted in place of a 3<sup>rd</sup> party food safety assessment.



**Global Food Safety Initiative (GFSI) certification** is preferred yet may be required of certain suppliers of manufacturing operations for the following types of suppliers; Private Label, Unbranded Suppliers. In addition, based on industry product recalls and outbreaks, suppliers of commodities of concern may also be required to obtain GFSI certification at the discretion of Schnucks Food Safety Quality Assurance. Please visit the following official GFSI website to obtain more information on recognized schemes:

- [mygfsi.com](http://mygfsi.com)

**3rd Party Food Safety Audit** can be used in lieu of GFSI certification if the facility is not required to have it and if it is performed by an accredited certification body. Food Safety assessment must be completed at all final processing/manufacturing operations on an annual basis.

**Qualified Facilities or Very Small Businesses** are required to meet FDA requirements. Qualified Facilities or Very Small Businesses are those that meet the FDA definition listed within [21 CFR 117](#) or [21 CFR 507](#) and are subject to modified requirements in 21 CFR 117.201 or in 21 CFR 507.7 respectively. This includes the requirement that the facility submits FDA Form 3949a for Human Food or Form 3949b for Animal Food, attesting to its status as a qualified facility.

- [Instructions for submitting Qualified Facility Attestation](#)

## Commodity Specific Requirements

Schnucks requires suppliers of specific commodities to have additional requirements of the food safety audit to ensure their products provide an additional layer of protection to our customers.

**Deli Meat:** *Listeria monocytogenes* (Lm) is recognized as a common human pathogen associated with ready-to-eat foods such as deli meats. It is recommended that Deli meat including bulk and pre-packaged meats should include a microbiological inhibitor that will not allow the growth of Lm to increase more than 1 log during the intended shelf-life of the product. Inhibitors used must be natural, food-grade preservatives that are typically accepted by the customer and do not negatively impact product quality, color or taste. Effectiveness of the inhibitor must be scientifically verified through a credible challenge study and available for review upon request. In addition a comprehensive Environmental Monitoring Program may be requested for review at any time.

**Raw Ground Beef products and products containing raw ground beef:** *E. coli* O157:H7 is a human pathogen associated with raw ground beef. Suppliers must test their raw materials and/or finished ground beef for *E. coli* O157:H7 using the N-60 sampling plan and approved test methods. Suppliers may be required to submit scientific validations and/or product testing program details for review upon request.



**Poultry:** Salmonella is a human pathogen associated with many recalls and outbreaks of poultry products. Suppliers of raw chicken products and raw ground turkey must source from primary breeders who participate in USDA's National Poultry Improvement Plan (NPIP) for Breeding Poultry (9 CFR 145.83). The supplier is expected to review this data regularly to monitor effectiveness of preventive and corrective actions that occur when *Salmonella* is detected and to reduce likelihood of re-occurrences. Suppliers are required to submit scientific validations of their interventions for review upon request.

**Frozen Berries:** Norovirus, Hepatitis A and *Shigella sonnei* have been the common pathogens associated with foodborne outbreaks from frozen berries. Suppliers are required to ensure that all operations that handle berries from harvest to final packaging have implemented food safety programs including; adequate handwashing, accessible restroom facilities, employee illness policy, employee immunizations policy and food safety training programs. Suppliers are expected to avoid sourcing berries from countries which have been previously implicated in viral outbreaks such as high levels of Hepatitis A or other pathogens of concern.

**Leafy Greens Produce:** Assistance in preventing contamination of leafy greens to protect consumers and increase communication across the supply chain.

- <https://www.fmi.org/forms/store/ProductFormPublic/fmi-recommended-food-safety-practices-for-leafy-greens>

## Packaging and Labeling

Schnucks requires suppliers of packaged goods, to package the items in sealed containers using appropriate Tamper-proof methods to provide a layer of protection to our customers.

Vendors should affix ingredient and nutritional information labels onto products that shall comply with all applicable FDA and/or USDA label requirements.

### Food labeling guidelines

- [USDA Inspected meat, poultry and egg products must have standard information labels](#)
- [USDA Label Submission and Approval System \(LSAS\): User Guide for Industry Users](#)
- [USDA National Bioengineered Food Disclosure Standard](#)
- [FDA Guidance for Industry A Food Labeling Guide Food Labeling Guide](#)
- [FDA Food Allergen Labeling and Consumer Protection Act of 2004 \(FALCPA\)](#)

### Country of Origin Labeling Requirement Compliance

All shipments must adhere to requirements articulated in the Country of Origin Labeling regulations (COOL) set forth by the United States Department of Agriculture. For additional information on the regulations, please visit the following link: <https://www.ams.usda.gov/rules-regulations/cool>





## Supplier Document Management System

Schnuck Markets, Inc. has partnered with TraceGains (TGs) to manage, communicate, and capture food safety required documents from our suppliers. As a supplier to Schnuck Markets, your participation in the Schnucks / TraceGains process is **required**. Access and participation is at **NO COST** to suppliers.

### Minimum Requirements for Schnucks Food Safety Vendor Approval -

- 3<sup>rd</sup> party Food Safety Assessment/Inspection/Audit Report, Certificate and Corrective Action Summary.
  - All suppliers of human and animal food or beverage products are required to obtain a food safety assessment on an annual basis. Local, State, FDA, and USDA inspections may be accepted in place of a 3<sup>rd</sup> party food safety assessment under prior authorization. Global Food Safety Initiative (GFSI) certification is preferred yet may be required of certain suppliers of manufacturing operations for the following types of suppliers; Private Label, Unbranded/Exclusive Suppliers including Deli Counter items (including bulk deli meats), Seafood, Raw Meat Suppliers and Salad bar Suppliers. In addition, based on industry product recalls and outbreaks, suppliers of commodities of concern may also be required to obtain GFSI certification at the discretion of Schnucks Food Safety Quality Assurance.
    - [mygfsi.com](http://mygfsi.com)
  - Harmonized GAP for Produce suppliers. GAP (good agricultural practices) certification is a USDA audit program through which producers can demonstrate their compliance with food safety requirements to purchasers and retailers.
    - <https://www.ams.usda.gov/services/auditing/gap-ghp/harmonized>
- Food Safety Plan (HACCP/HARPC)
  - Current Good Manufacturing Practices (cGMP), Hazard Analysis and Risk-Based Preventive Controls for Human Food.
    - <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-human-food>
    - <https://www.ams.usda.gov/services/auditing/gap-ghp/harmonized>
  - Current Good Manufacturing Practices (cGMP), Hazard Analysis and Risk-Based Preventive Controls for Animal Food.
    - <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-animal-food>
- Food Product/Produce/Broker-Distributor/Primary Packaging assessment. Food Safety Quality supplier self-assessment to evaluate vendor's Food Safety Systems.
  - Provided by Schnucks.
- Letter of guarantee for Primary Packaging materials for Food Products.
- Allergen Control Policy
- Supplier Contact Information
- Supplier Questionnaire – TGs



- Food Defense Plan Statement
- Recall Plan

#### **Restaurant Minimum Requirements for Schnucks Food Safety Vendor Approval -**

- Health Permit to Operate Food Service Establishment
- Local Department of Health Food Service Establishment Inspection Report
- Permission to sell at Retail from the restaurant's licensed authority (State and/or Local Health Department)

## **Temperature Monitoring Requirements**

Temperature Monitoring requirements were developed to assist with compliance to the Food Safety Modernization Act's (FSMA) Sanitary Transportation Rule for Human and Animal Food and drive our Best in Fresh initiatives. Temperature sensitive loads delivered are required to have a Sensitech TempTale RF temperature monitor on each load sent to Schnucks Warehouse/Distribution Centers. Details of this requirement can be found within the Schnucks Warehouse Vendor Compliance Policy, section A.5 Temperature Monitoring Requirements for Fresh/Frozen Products.

- <https://nourish.schnucks.com/suppliers/>

## **Contact Us**

If you have questions regarding the Food Safety Requirements outlined in this guide, please feel free to contact us by email at [QualityAssurance@schnucks.com](mailto:QualityAssurance@schnucks.com).

If at any time you are in need of your product or products to be pulled from our retail stores for any reason including a withdrawal or recall situation, please immediately contact our Food Safety team to initiate the product removal process at [foodsafetyrecallteam@schnucks.com](mailto:foodsafetyrecallteam@schnucks.com).

Please include the following information in your email communication:

- Description (manufacturer & brand)
- Package Size/Weight/Count, etc.
- Item Code
- UPC Number
- Production/Lot/Date Codes affected
- Reason for Recall
- Markets affected and distributed– all stores, warehouse only, etc.
- Manufacturer instructions for handling products (destroy, hold, etc.)
- Vendor Name and Number

Schnuck Markets, Inc. appreciates your partnership and continued commitment to Food Safety and Quality.