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HACCP Programs

Copies of HACCP programs are not distributed because of the proprietary nature of the material. Due to the constant review of HACCP plans, any uncontrolled copies issued rapidly become obsolete. Instead, the following HACCP information is being provided. Cebro/White Oak Frozen Foods (CWOFF) has developed and implemented a HACCP plan and established facility HACCP team. These programs are available for your review during a plant visit.

The CWOFF plant HACCP team include representatives from various functional areas. All plant HACCP team leaders have received HACCP training. Many HACCP representative's have received formal HACCP training through a customized National Food Processors (NFPA) course or from organizations such as Silliker or the American Institute of Baking (AIB).

Following the seven HACCP principles, the CWOFF plant HACCP team developed HACCP plans appropriate to their products and processes. Critical Control Points (CCPs), critical limits, monitoring methods and corrective action responses have been identified and documented. The HACCP team has also identified those hazards best managed via existing prerequisite programs. The plant HACCP team routinely reviews and revises the HACCP plan and programs as changes in operations and HACCP continue.

Record review, internal HACCP auditing and management review are fundamental to the continued success of a HACCP program. As a critical element of the HACCP program, CWOFF has established the requirements for documentation and review as appropriate to the operation. HACCP plans are also reviewed by visiting Customers and/or third party auditors such as AIB or NFPA-SAFE.

Managing hazards via prerequisite programs is critical to HACCP success. CWOFF considers prerequisite programs to be those well-established practices and activities. An explanation of these core prerequisite programs follows.

Prerequisite Programs

Allergen control

CWOFF recognizes that there are many different foods that may cause allergic reactions in some people. People with known food allergies depend upon accurate and clear labeling information in order to avoid these specific foods. The vast majority of all recorded life-threatening allergic reactions are caused by nine foods.

They are:

- | | | |
|--------------------------------|---------------------------------------|-----------|
| 1. Peanuts and peanut products | 5. Egg and egg products | 9. Celery |
| 2. Tree nuts | 6. Dairy and dairy products | |
| 3. Fish | 7. Wheat and wheat products | |
| 4. Shellfish | 8. Soybean and soybean-based products | |

Note: Food allergen materials that do not contain protein are not allergenic. Materials such as highly processed soybean oil are not treated as food allergens. This position is recognized by the Food Allergen Research and Resource Program (FARRP) as well as by the Food Allergens and Anaphylaxis Network (FAAN).

It is CWOFF's policy to minimize the risk of food allergen carry-over by developing and implementing product changeover procedures that effectively remove food allergen residue.

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Allergen control, continued.

This includes the adherence to a visual clean standard for manufacturing equipment. It is also the Company's policy to ensure that product labeling adequately describes the presence of food allergen-containing ingredients.

Although allergens are not an issue at CWOFF, a Food Allergens Awareness training program has been developed for all of its management employees. Additionally, CWOFF maintains an active role in monitoring or participating in the Food Allergen Research and Resource Program (FARRP) at the University of Nebraska, in order to maintain a high level of knowledge on this issue.

Auditing programs and facility inspections

A variety of internal auditing programs are in place. CWOFF performs audits of their HACCP, Quality Systems, Sanitation and GMP programs. CWOFF facilities (plant and distribution centers) are examined at least once a year by the NFPA-SAFE (Supplier Audits for Food Excellence) audit of which the SAFE audit results reside on the NFPA-SAFE website (www.nfpasafe.net/safe.htm).

Continuous improvement

CWOFF, is committed to the process of Continuous Improvement in all aspects' of its business. In terms of product manufacturing, specifications have been developed for all materials and document each occurrence of faulty material and/or faulty manufacture. Suppliers are informed of defective materials, and corrective action plans are requested. Plant staff are required to identify the root cause of manufacturing failures and respond with appropriate corrective action. In all cases, the focus is on prevention of operating issues and providing only quality assured products to customers. Performance goals include reduction in faulty manufacture.

Employee training and retraining

All employees receive training in the areas of Good Agricultural Practices (GAPs), Good Manufacturing Practices (GMPs), general HACCP concept and personal safety. Job specific training would include HACCP Critical Control Point (CCP) training and job procedure training, as appropriate. Training is provided in multiple languages to assure thorough understanding. Each employee receives annual refresher training in those areas critical to job performance such as GMPs and HACCP.

Environmental monitoring

An environmental monitoring program is in place in accordance with company standards. Samples are taken of water, air, product contact surfaces (conveyors, worktables, etc.), and non-product contact areas (drains, walls, floors, air conditioning equipment, forklifts, etc.). The specific locations tested, number of locations tested and the organisms for which those areas are tested at an established frequency. Limits have been established, and protocols are in place when out of limit results occur.

Finished product specifications

Customer specifications are submitted to the CWOFF Quality Technical staff for review and approval. Once a review of the specification is completed, the customer will be informed of acceptance of the specification, conditional acceptance with identified changes, or CWOFF proposed recommendation for the specification.

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Finished product testing and release

Test plans for finished products are developed using the customer's specification and requirements along with CWOFF knowledge of the product, ingredients, packaging requirements and process. Products are then tested and released against this test plan using the established limits and customer requirements.

Ingredient control

Appropriate actions are taken to assure that purchased inventory items conform to the specified requirements. This may be done by inspecting and testing the product and/or by accepting a supplier's test results. The type and extent of testing performed on the inventory items are specified for each product or product category in the plant quality test plan. The condition of the delivery vehicle and items received are evaluated as prescribed in the plant HACCP and prerequisite program procedures.

Non-conforming materials

When a non-conforming raw material or finished product is identified, it is captured, isolated, marked, and recorded as a NCR (Non Conforming Report). An investigation is conducted to identify the source of the failure and is used to initiate corrective action to prevent a recurrence.

A record of the non-conforming raw material or finished product is maintained. The information in the quality report is tabulated and compared to historical data to indicate trends and monitor the effectiveness of the corrective actions.

Pest control

CWOFF employ Integrated Pest Management to maximize the effectiveness of pest control efforts while minimizing the amount of pesticide needed. Control of the physical environment, especially the building perimeter, is an important feature of each plant's pest control program. CWOFF contract with reputable pest control services to provide this service for the facility.

Personnel and personal hygiene

Good Manufacturing Practices (GMPs) are included in all new employee training. An annual review of GMPs with all employees also occurs. Regular self-audits of the facility reinforce GMPs and result in correction where appropriate. Quality Assurance also performs Food Safety and Hygiene audits of suppliers.

Preventive maintenance

CWOFF is developing a computer-driven preventive maintenance programs. The programs have been populated with preventive and routine maintenance tasks and requirements. Both programs generate detailed work orders for maintenance to be completed at the needed time. Maintenance Technicians record their activities and any findings on the work orders.

Sanitation program

CWOFF follows a master sanitation schedule to ensure that the sanitation program provides effective and complete cleaning as needed to all areas of the plant environment. Workers follow and document a daily, weekly, and monthly check-off of sanitation activities. Adequate management support is provided to ensure proper cleaning.

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Sanitation program, continued

Outside experts have been contracted to assist in the selection of chemicals and the development of cleaning methods. Procedures for cleaning have been developed to allow for minimum use of chemicals to provide the appropriate level of cleaning and sanitation. Cleaning and sanitizer concentration strength is documented to ensure that these chemicals are being used in a proper manner.

Traceability and recalls

Recall Committee and procedures exist. The recall system is tested at least twice a year to ensure the system's effective operation. Lot information records are retained from the receipt of material through shipment to the customer to ensure effective product traceability. The CWOFF company standard is that 95% of the material in question be traced within four hours and 100% of the material be traced within 24 hours.

Vendor approval

New suppliers are approved on the basis of their ability to meet the requirements of the product or service to be purchased. The Supplier Quality Management Group of CWOFF evaluates the supplier's ability by analyzing the information contained in the response to request for information (RFI) forms sent to all suppliers before they are approved. The CWOFF Technical Group approves the product by evaluating its performance in a test batch of final product or by evaluating a sample of the product from the supplier. Members of the Quality or Purchasing staff may arrange for an objective evaluation of the supplier's quality system by a qualified third party. CWOFF maintains a list of all approved manufacturers of raw materials on the Approved Vendor List (AVL).

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