



# FOOD SAFETY MANAGEMENT SYSTEM CODE OF PRACTICE

## SUPPLIER APPROVAL AND MONITORING PROGRAM

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# Code of Practice

## Food Safety Department

### Supplier Approval and Monitoring Program



Commitment to food safety is our culture

#### I. Overview

An effective supplier assurance program must be in place to ensure consistent supply of safe food to Emirates Flight Catering (EKFC). The approval process ensures food suppliers and primary packaging material suppliers meet EKFC food safety standards as well as legal standards. The ongoing monitoring of these suppliers ensures that various airline clients' requirements are satisfactorily met.

#### II. Purpose

To establish a protocol ensuring that all food products and food packaging materials used in EKFC are sourced from an approved supplier, based on established criteria.

#### III. Scope

This Code of Practice covers all food and food contact packaging material suppliers of EKFC for both local and overseas suppliers.

#### IV. Responsibilities

The Management team is responsible for the approval of resources required to implement this Code of Practice.

The sourcing solutions department is responsible for updating the new suppliers in the *supplier database*, notifying new suppliers to be audited, and for sharing the audit report with supplier in time.

The sourcing solutions team is responsible for coordinating with the suppliers for scheduling announced and unannounced audits, and for liaising with the suppliers' responses on the audit non-conformity or corrective actions taken.

The Food Safety team is responsible for scheduling and conducting supplier audits and communicating the audit outcome with the concerned stakeholders.

Suppliers are responsible for facilitating the scheduled and unannounced audits in a reasonable time frame and for responding with corrective actions taken within the stipulated time frame.

#### V. Definition

5.1 **Audit** – A systematic, independent and documented process for obtaining evidence and evaluating it objectively and scoring to determine the extent to which the audit criteria are fulfilled.

5.2 **High Risk Food Supplier** – a food supplier that provides the facility with Potentially Hazardous Food(s), e.g. Ready to eat time and temperature control for safety (TCS) products, sandwiches, salads, sanitized fruits and vegetables, desserts containing dairy and cream, raw seed sprouts

5.3 **Medium Risk Food Supplier** – a food supplier that provides the facility with: 1) moderately hazardous food, e.g., Un sanitized raw fruit and vegetables; and 2) raw potentially hazardous food that will undergo heat treatment and rapid cooling (e.g., raw meat, poultry, fish & seafood, raw milk)

5.4 **Low Risk Food Supplier** – a food supplier that provides the facility with non-hazardous foods that are also shelf stable or ambient stable (e.g., sugar, dry pasta, cereals, oil, bread, dried herbs, commercially canned food items, UHT treated food items).

5.5 **On-site audit** – An "on-site audit" based on the criteria established by EKFC on the HACCP or FSMS protocol. It includes on-site assessment of the processes, control measures, for its adequacy, suitability and efficiency against the requirement. It occasionally includes vertical verification of a particular product or process based on random sampling plan.

5.6 **Electronic Audit (E-audit)** – remote assessment that is undertaken by using audit criteria established on the HACCP and FSMS control systems. This consists of remotely assessing the supplier document management system and verifying the evidence of process control and monitoring system. This does not include the physical inspection of supplier premises.

5.7 **Food Supplier** – is any food producing, handling or distributing entity that provides food items to the facility, including wholesalers and distributors

5.8 **Food Contact Suppliers** – suppliers who manufacture or distribute food contact materials, which are used as primary packaging materials which directly comes into contact with the food.

## VI. Procedure

### 6.1 Types of Supplier Audits

6.1.1 **Supplier Accreditation:** Usually conducted for a new supplier, this involves the complete assessment of the audit criteria in which the outcome of audit recognizes the supplier meeting EKFC food safety criteria and decides on the approval or rejection status of a supplier.

6.1.2 **Follow-up Audit:** This is a re-audit for the previously audited supplier to evaluate the corrective actions implemented for its intended purpose. This is usually conducted for a supplier upon receipt of evidence of corrective actions taken or implemented on the non-conformity raised from the last audit, and from the request of supplier.

6.1.3 **Problem Investigation:** The audit conducted to investigate a particular food safety concern such as detection of critical foreign object, alleged food-borne illness or repeated microbiological failure from the product supplied to EKFC. This can be a partial audit customized for this particular

concern. Follow up audit reports can be generated in a generic format without using checklist.

6.1.4 **Surveillance Audit:** This is a periodic audit occurring at a set frequency for high, medium and low risk suppliers, or as per audit schedule. This is conducted only for active suppliers for the particular year as part of continual supplier monitoring.

6.1.5 **Electronic Audit (E-audit)** - *This is a remote assessment that is undertaken by using audit criteria established on the HACCP and FSMS control systems which does not include the physical inspection of supplier premises. This consists of remotely assessing the supplier document management system and verifying the evidence of process control and monitoring system.*

## 6.2 Supplier Approval Audit for New Suppliers

6.2.1 All food suppliers of Emirates Flight Catering should be audited and approved by the Food Safety Department before the commencement of purchasing of food items.

6.2.2 The sourcing solutions team should send a pre-audit questionnaire to the suppliers.

6.2.3 The sourcing solutions team should ensure that the supplier completes the pre-audit questionnaire to assess the basic food safety system implemented at the supplier facility.

6.2.4 Based on the review of pre-audit questionnaire and supporting evidence obtained, the food safety department should decide on proceeding for a site audit.

6.2.5 In certain cases, instead of site audit, e-audit or virtual audit can be conducted for a new supplier upon review of the pre-audit questionnaire and considering the risk level of supplier. This should be done based on the technical review and risk assessment by the food safety department.

6.2.6 On-site audits should be conducted based on the schedule between supplier and EKFC Food Safety Department using Supplier Audit Checklist (FS-COP-PRP-029-FRM-01).

## 6.3 Audit for Existing Suppliers

6.3.1 Surveillance audits for suppliers should be conducted based on audit plan schedule using Supplier Audit Checklist (FS-COP-PRP-029-FRM-01).

6.3.2 Unannounced audits are preferred for the existing Local high-risk suppliers.

6.3.3 Food suppliers should be audited based on the degree of food safety risk categorized as:

GROUP	RISK	FREQUENCY OF AUDIT
Group 1	High	<i>Once in a year</i>
Group 2	Medium	<i>Once in a year</i>
Group 3	Low	<i>Once in 2 years</i>

*Note: For food suppliers that provide products to use for Medina Flights, the audit frequency for High, Medium and Low risk category foods are once in 12 months, once in 12 months, and once*

*in 24 months respectively.*

See Attachment 9.1. Table 1 for Frequency of Audits based on Risk Category.

- 6.3.4 A Problem investigation audit is conducted in response to a critical food safety concern related to a supplier. This could be an unscheduled audit. Problem investigation audit can be a partial audit focusing on the particular area of concern. The report of problem investigation audit can be generated without using checklist and scoring.
- 6.3.5 The frequency of surveillance audits can be increased according to the non-conformance observed during the supplier audits. Non-conformity reports (NCR) should be raised to the supplier by the stakeholders who identified defects on the supplier products or service delivery. Sourcing solutions department liaises with the suppliers for the NCR responses. Smartsheet is used to track the NCRs, which all concerned parties could access. Sourcing solutions or the respective stakeholders could make recommendations for audits if there were issues with the supplier or products. Any recommendations to the audit should be assessed by the Food Safety department before accommodating it and if it is actually deemed necessary.
- 6.3.6 Supplier Audit Checklist (FS-COP-PRP-029-FRM-01) should be used to assess the supplier facility against the criteria stipulated. Audit outcome (Approved or Rejected) should be communicated to Sourcing solutions, Fulfillment, end user department and Quality Department (QD).
- 6.3.7 Other stakeholders (e.g. Quality Department, Sourcing solutions, and Production Department) can join with Food Safety Department for the audit whenever required.
- 6.3.8 Audits should also be done for suppliers based on the management's request or for specific complaints and/or follow up or for a new supplier.
- 6.3.9 Master list of approved suppliers and records of audits should be maintained by Food Safety department. This can be the list issued in COUPA portal.
- 6.3.10 The updated status of supplier approval list (FS-COP-PRP-029-FRM-03) should be shared with all concerned departments by the Food safety department.
- 6.3.11 Supplier audits should be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques from EKFC Food Safety Department or authorized by EKFC food safety department. Auditors should have a basic qualification of Food Safety Level 3 or have a degree in Food Science or equivalent and have attended internal auditor training.

#### **6.4 Overseas Food Suppliers Certification Procedure**

- 6.4.1 Sourcing solutions should send request to Food Safety Department for conducting E-audit for any new supplier.
- 6.4.2 *Food Safety team is conducting E-Audit for Overseas Food Suppliers as a part of Supplier approval program.*

6.4.3 *In addition to self-assessment questionnaire, Overseas food suppliers can be audited by using any virtual platform, if deemed necessary.*

6.4.4 Annual audits should be scheduled by Food Safety team and should contact the supplier in coordination with Sourcing solutions.

6.4.5 Any additional supporting documents required should be specified in the email.

6.4.6 *If the manufacturer is GFSI (Global Food Safety Initiative) certified, self-assessment is not required but the supplier shall submit the below mentioned documents*

1. *A valid GFSI certificate*
2. *GFSI audit report, with corrective action report and supporting evidence.*  
*In case for confidentiality reasons if the audit report is not shared, an official declaration confirming the closure of the non-confirming observations reported during GFSI audit to be provided.*
3. *Product details (Product name, shelf-life, and storage conditions).*

6.4.7 *For GFSI, FS-COP-PRP-029-FRM-06 E-audit Feedback Summary must be prepared by the auditor and submitted with the supporting documents as per the requirement.*

6.4.8 *If the manufacturer is not GFSI certified suppliers should complete self-audit based on the risk categorization and audit frequency.*

6.4.9 Food Safety Department should send out the Supplier Audit Checklist Form (FS-COP-PRP-029-FRM-01) to the respective supplier with a covering letter for self-audit.

6.4.10 *Self-audit* should be carried out by one or a team of qualified persons from supplier's organization and report findings in Supplier Audit Checklist Form (FS-COP-PRP-029-FRM-01).

6.4.11 *Food allergen questionnaire form (FS-COP-009-FRM-03) is also provided to the supplier as part of the self- audit.*

6.4.12 E-audit forms should be returned within 14 days of receiving the audit request with all relevant supporting documents.

6.4.13 *Based on the response received from the supplier, Food Safety Department evaluate the supplier Audit Checklist Form (FS-COP-PRP-029-FRM-01).*

6.4.14 Completed Supplier Audit Checklist Form (FS-COP-PRP-029-FRM-01) with the status of the supplier *should be reviewed and approved by Food Safety management* and then be forwarded to Sourcing solutions, Fulfillment, and other stakeholders, if the supplier is rejected.

6.4.15 Non-conformance Summary Report should be raised against any critical points observed and forwarded to the supplier for corrective actions.

6.4.16 E-audit status file should be updated accordingly by the food safety department.

6.4.17 Overseas Food suppliers can be audited by using any of the virtual platform. A guideline for virtual audit should be established by the Food Safety team.

## 6.5 Audit Results Classification

6.5.1 **Approved Suppliers** – suppliers who met the required food safety audit criteria and are deemed fit to supply food products which are included in the scope of intended products for supply. The approval is for the product or process covered in the audit scope. Any product which is produced in a new process line or new product category, the Procurement team should notify the Food Safety Department for re-assessment (e.g., the supplier is approved for processing of fruits and vegetable, new audit should be conducted to assess the control measures when they start producing sweets).

If any product from approved suppliers showed failed results in in-house microbiological analysis due to detection of pathogen, specific products can be rejected or banned.

6.5.2 **Rejected Supplier** – The supplier is deemed rejected when they fail to meet the minimum requirements as per the food safety audit criteria.

**Table 2. Supplier and Product Rejection Criteria**

SN	SCENARIOS <sup>1</sup>	TYPE OF REJECTION <sup>3</sup>	ACTION
1	Supplier fails in the audit	Supplier is rejected	Notify Procurement, all stakeholders, and Finance Department to block the supplier in the ERP System
2	Repeated micro failure due to pathogenic microorganisms <sup>2</sup>	Product is rejected	Notify all stakeholders and Finance Department to block the product in the system
3	Presence of a critical foreign object in products	Product is rejected	Notify all stakeholders and Finance Department to block the product in the system
4	Repeated failure in meeting quality parameters and indicator microbiological organisms	Product is rejected	Notify all stakeholders and Finance Department to block the product in the system

**Notes:**

<sup>1</sup>In all the above scenarios, the cases will be assessed individually and decided whether the rejection on supplier or product is deemed necessary or not.

<sup>2</sup>The number of consecutive failures when the product should be rejected is decided by the Food Safety Management with reference to the microbiological guidelines for food, local regulatory requirement and microbiological specifications stipulated by the customer.

<sup>3</sup>Upon issuance of the notification of supplier rejection or product rejection, the sourcing OR delivery of the product should be stopped with immediate effect. The concerned department should follow the applicable product substitution protocols and customer should be notified accordingly.

<sup>4</sup> In case, if immediate stopping of supply from a rejected supplier causes hindrance in

operations, due to unavailability of an alternative source, supply from a rejected supplier can be continued upon review and exceptional approval from Food Safety Department. This will be for a limited period and purely risk based.

Refer to FS-COP-PRP-029-FRM-02 - Record for Rejected Supplier or Product

## 6.6 Verification

- 6.6.1 The Food Safety team should verify the products supplied to EKFC if they are from approved suppliers and if the audit frequency is met for high risk, medium risk and low risk suppliers.
- 6.6.2 Once a supplier is rejected by Food safety department and the notification is sent to concerned stakeholders, food safety team should do a verification if any LPO is issued after the date of notification. If there are any breaches noted, an internal NCR should be issued to Procurement.
- 6.6.3 The Fulfillment team should ensure that rejected suppliers are not supplying products in EKFC as per notification.

## 6.7 Corrective Action

- 6.7.1 The supplier should take appropriate and timely resolution of non-compliances identified in the audit. The corrective action plan should be provided within 7 days from the receipt of audit report and evidence of closure of these points (for those related to facility enhancement) within 3 months.
- 6.7.2 The supplier should document appropriate and timely corrective actions and report back to EKFC within stipulated time. The corrective action report should include evidence to substantiate the corrective measures are closed effectively. Respective auditor from food safety team or the Food Safety Specialist assigned should verify the adequacy of corrective action taken to close-out NCR.
- 6.7.3 During the next scheduled audit, or during Follow-up audit, the Food Safety team should verify on spot if non-conformances from previous audit are closed-out by the supplier or remains open.
- 6.7.4 In case of failed suppliers, the auditor should ensure that non-conformity raised are resolved and corrective actions are effectively implemented.
- 6.7.5 Should the rejected supplier require for follow up audit, all the evidence of the corrective action from the previous audit should be submitted to Food Safety Department. The Food Safety team should evaluate the adequacy and suitability of the evidence of corrective actions taken and decide whether to pursue the follow up audit or not.
- 6.7.6 In case of product failure, the supplier should take necessary actions by reviewing the process flow of the product and root cause should be identified. The corrective actions taken, including the investigative report and root cause analysis should be submitted to the Food Safety Department. Furthermore, the supplier should submit three (3) passed results of analysis of the failed product from an independent accredited laboratory for evaluation of the Food Safety Department.

Decision on reinstating the product should include testing of the product in the in-house

laboratory, a technical review by the food safety team and the respective stake holders.

## VII. Documents

- 7.1 FS-COP-PRP-029-FRM-01 Supplier Audit Checklist (with Addendum)
- 7.2 *FS-COP-PRP-009-FRM-03 Food Allergen Questionnaire*
- 7.3 FS-COP-PRP-029-FRM-02 Record for Rejected Supplier or Product
- 7.4 FS-COP-PRP-029-FRM-03 Supplier Audit Status
- 7.5 COUPA Masterlist of Approved Suppliers

## VIII. References

- 8.1 British Airways, Global Technical Standards for Inflight Caterers and Airport Lounges, Version 1.2, 12 April 2023.
- 8.2 Dubai Municipality Food Code 2.0, Final Draft 12 July 2023.
- 8.3 QSAI Catering Quality Assurance Programme, Food Processing Safety and Interpretation Guidelines, Version 10.0, 01 Jan 2019
- 8.4 CPD Procedure CPD-02A Supplier Pre-registration & FSCAR Process

## IX. Attachments

### 9.1 Table 1. Frequency of Audits based on Risk Category

GROUP CATEGORY	RISK CATEGORY	FREQUENCY OF VALIDATION AUDIT	TYPE OF AUDIT
Group 1	High Risk	Once in 12 months	Unannounced On-site, e-audit or Virtual audit *
Group 2	Medium Risk	Once in 12 months	Unannounced On-site, e-audit or Virtual audit *
Group 3	Low Risk	Once in 24 months	Unannounced On-site, e-audit or Virtual audit *

Note:

\*E-audits or Virtual audits will be conducted for overseas suppliers or local suppliers. However, the suitability of the audit criteria should be supported by evidences. Food Safety team should prepare the e-audit or virtual audit plan.

The decision to undertake e-audit or virtual audit will be based on case by case evaluation and risk assessment. However, when the audit is deemed necessary when a critical problem arises, the audit shall be on-site wherever possible.

### 9.2 Summary of Evaluation of Conducted Audit

EVALUATION	CRITERIA
Approved	<ol style="list-style-type: none"> <li>1. Suppliers must have a total score of more than 80%</li> <li>2. No critical findings.</li> </ol>
Rejected	<ol style="list-style-type: none"> <li>1. Suppliers having a score of less than 80%</li> <li>2. Two or more audit criteria have a score less than 75%</li> <li>3. 1 or more critical findings</li> </ol>

### 9.3 Risk Category of Food Products

RISK CATEGORY	FOOD PRODUCTS
High	<ol style="list-style-type: none"> <li>1. Ready to eat cooked or processed Poultry, Seafood and Meat</li> <li>2. Ready to eat cut, sliced fruits &amp; vegetables</li> <li>3. Fresh Milk</li> <li>4. Any food containing cooked or processed poultry, seafood and meat e.g. Casseroles, Deli meats, Salads, Sandwiches, Crabmeat, dessert containing dairy, cream filled bakery products, custards, puddings and soft cheeses</li> <li>5. Eggs and other protein rich foods like soybean products and food containing them, such as quiche, soy milk, salads and casseroles</li> <li>6. Any food originating from a plant that is heat-treated, such as cooked vegetables, beans, rice and pasta dishes</li> <li>7. Raw seed sprouts such as alfalfa and bean sprouts</li> <li>8. Garlic-in-oil mixtures that are not modified in a way that results in mixtures that do not support growth of any microorganisms</li> <li>9. Fresh cut or peeled fruit or vegetables, such as cut melons, watermelons, cantaloupe, fruit salads or fresh fruit juices</li> <li>10. Soft cheese &amp; Hard Cheese</li> </ol>
Medium	<ol style="list-style-type: none"> <li>1. Foods that will undergo further Heat Treatment, which is the case for Poultry, Raw meat and Seafood</li> <li>2. Raw fruits &amp; Vegetables</li> <li>3. Ice cream</li> <li>4. Fermented dried meats (e.g. salami)</li> </ol>
Low	<ol style="list-style-type: none"> <li>1. Sugar</li> <li>2. Sugar-based confectionary</li> <li>3. Jam</li> <li>4. Honey</li> <li>5. Syrup</li> <li>6. Grains and cereals</li> <li>7. Dry pasta</li> <li>8. Bread</li> <li>9. Pastry without Potentially Hazardous garnishes</li> <li>10. Fats &amp; oils</li> <li>11. Dried food, dry herbs, acidified food (pickles, sauerkraut)</li> <li>12. Commercially canned foods</li> </ol>

Note: The list is not exhaustive, only examples.

#### 9.4 Exceptions for Non-contracted or Adhoc suppliers

- 9.4.1 For client or airline nominated product, the approval process should be determined between the airline and EKFC during contract development. Proof of supplier approval documentation should be provided by the client or airline to EKFC upon request.
- 9.4.2 There would be emergency occasions where a food item or primary packaging material will have to be sourced from an unapproved or rejected supplier or occasions that necessitate to continue buying from rejected suppliers for business continuity. In such event, this must be communicated to Food safety department for assessment and approval. The decision should be made upon obtaining alternative assurance such as Letter of Guarantee or Certificate of Analysis from supplier or in-house tests.
- 9.4.3 At times, it could be acceptable to conduct a partial audit for a supplier and produce the audit report in the form of a word document or email. In such case, the reason for exception needs to be clearly stated in the report.

#### 9.5 Audit exceptions

- 9.5.1 New or existing suppliers who are certified for any of the GFSI recognized scheme shall be exempted from conducting on-site supplier accreditation and surveillance audits. However, problem investigation audit shall be conducted on-site wherever applicable.
- 9.5.2 The suppliers should submit the last audit report and corrective action plan of the GFSI recognized scheme certifications for review and evaluation by food safety department.
- 9.5.3 The audit outcome will be based on the evaluation of audit report issued by the third party certifying body.
- 9.5.4 Food Safety team will conduct the technical review and risk assessment on the report and supplier profile. This evaluation should include number of foreign object complaints reported in the previous year and the number of microbiological failures reported.

SI NO	GFSI recognized scheme	Required Documents for Review	Type of audit Exempted	Type of suppliers Exempted
1	1.FSSC 22000 2.BRC 3.SQF 4.IFS	Audit report, Corrective action plan and evidences (Wherever applicable)	Certification	1.High 2.Medium 3.Low
2		Audit report, Corrective action plan and evidences (Wherever applicable)	Surveillance	
3		Audit report, Corrective action plan and evidences (Wherever applicable)	Follow up	

## 9.6. *Conditional Grace Period for Rejected Supplier*

- 9.6.1. *In an instance where EKFC requires to continue buying products from a rejected supplier due to operational requirement and business continuity, a grace period of maximum 30 days from date of rejection will be given to continue supply. This is granted only based on a request from the procurement team, outlining efforts to find an alternate supplier for the products that supply.*
- 9.6.2. *This is a conditional grace period based on a risk evaluation performed by the Auditor and Food Safety department on a case by case.*
- 9.6.3. *Procurement team should utilize the grace period to arrange alternative approved supplier for the products implicated.*
- 9.6.4. *Any further extension of the grace period shall only be granted if a comprehensive transition plan is in place to migrate the products supplied by the rejected supplier to an alternate supplier.*

## X. Document Control

This is a controlled document. The copy of this document is issued according to the distribution list in FSSC 22000 Masterlist of Controlled Documents (MCD).

## XI. Appendix

### 11.1 Hazard Identification and Risk Analysis

SN	HAZARD TYPE	HAZARD IDENTIFIED	RISK IMPACT
1	Microbiological	N/A	N/A
2	Physical	N/A	N/A
3	Chemical	N/A	N/A
4	Allergen	N/A	N/A