The Neal's Yard Dairy Quality System

Quality Aims (Quality Policy Statement)

- To select the best farm cheeses in Britain, which have the finest flavour achievable, the highest level of safety that can be attained, and which conform to legal requirements.
- To mature them when the flavour will improve.
- To recognise when they already taste as good as they can.
- To sell them when their flavour is at its best.
- To provide all the information necessary for the customer to get the fullest enjoyment from them.

Food Safety Aims

- We aim to sell cheese that has been hygienically produced and has as small a food safety risk to our customers as possible, in accordance with current industry codes of best practice.
- We recognise, however, that absolute safety is unachievable.
- We feel that a pursuit of complete food safety at the expense of eating quality is undesirable.
- We aim to achieve a balance between safety and flavour that constitutes an acceptable risk.

Managing Quality

- We have worked with cheese makers for over twenty-five years. During this time, our quality management has been based on direct contact with the cheese makers, farms, cheeses and our customers. We have built up an understanding of the cheeses we handle over this period.
- Our current quality management system has been developed and formalised in response to the company's growth. It is continually assessed and improved in accordance with our quality aims in order to provide compliance with the current food safety legislation.
- To help us achieve this, we are audited against the SALSA + SCA standard.

Scope of HACCP Plan

Buying and Storage

Products bought are cheeses, which are primarily farm-produced

- These are bought direct from the producer, often before they are fully mature, and ripened if necessary
- They may or may not have been selected by NYD on the farm before purchase $% \left(1\right) =\left(1\right) \left(1\right$

Other dairy products, including eggs, butter, milk, cream, and bread are also bought

- As with cheese, these are bought from approved suppliers

Packing and distribution

Cheeses may be cut to order and are packed and sold to other retailers and restaurants Cutting and packing involves:

- Selecting cheese to order
- Cutting to size using knives or cheese wire
- Wrapping cut pieces and packing them for transport
- Sending out by refrigerated truck or van, or overnight courier with ice packs if necessary

The cheese is sometimes still maturing when distributed and therefore some cheeses may not be sent out under refrigeration Some cheeses are exported

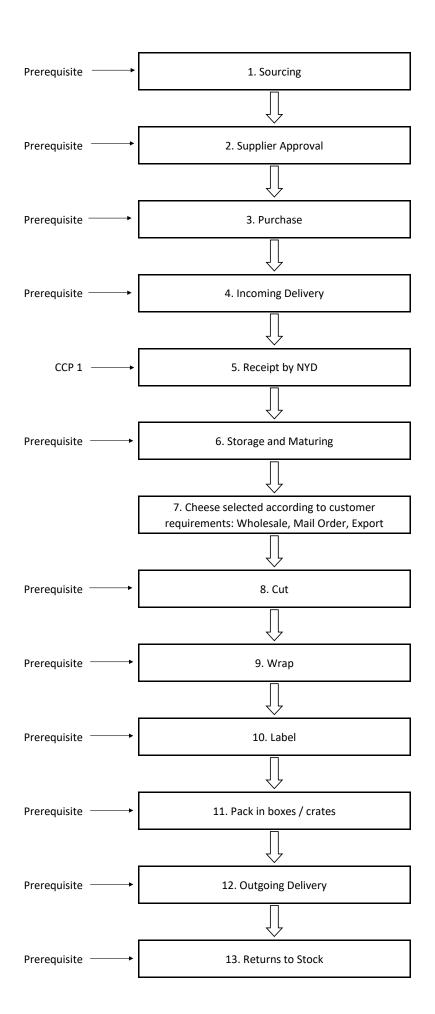
Intended use of product

Wholesale sale Retail sale Courier distribution (mail order)

Consumption

Product is sold for general consumption with no further processing required, unless consumer decides to cook with it

Member Name	NYD Department	Role
Bronwen Percival	QA & Buying	Chair
Deirdre Ward	QA	Coordinator/ Participant
Katie Grice	Production	Participant
Gareth Hewer	Cheeseshift	Participant
Owen Baily	Production	Optional Participant
David Lockwood	Director	Optional Participant
Sarah Stewart	Director	Optional Participant



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Process Step	1 2 SOURCING SUPPLIER APPROVAL	3 PURCHASE		4 6 DELIVERY	
Description of Risk			Growth of pathogens above approved limits during transport.	Cheese being physically or microbiologically contaminated during transport.	
Risks					
Microbiological - Pathogens	E.coli O157, Salmonella, Listeria monocytogenes, Staph. aureus.		Salmonella, Listeria monocytogenes, Staph. aureus.		
Chemical	at source		n/a	during transport	
Physical - Glass	at source		n/a	during transport	
Physical - Metal	at source		n/a	during transport	
Allergens	at source		n/a	during transport	
Assessment of Risk and Control Measures	Sourcing and Supplier Approval is critical. This risk can not be controlled by a CCP but it represents our most significant risk. Please refer to Resale Buying, Supplier Risk Analysis, Specifications & Monitoring and Non-Resale Buying Policies and Procedures documents for our detailed policies covering this area.	This risk can not be controlled by a CCP. It is addressed by the pre-requisite that our computer software makes it impossible to purchase anything from a supplier that is not approved.	The simplest control for this risk would be to restrict delivery temperature to that which controls growth of pathogens. We do not apply this to all cheeses, however. Maturation of cheese is carried out at temperatures outside those which control pathogen growth. Cheese delivered to NYD is in its maturation phase. Maturation is continued at NYD. Reducing cheese temperature during delivery only to warm it up again during maturation is not a sensible method of controlling pathogen growth. To mitigate this risk, we rely on our Supplier Approval process step and 'Cheese Receipt Procedure CCP1'. Staff checking in goods are trained on the Cheese Receipt Procedure.	This stage in the process is outside of our direct control. Our experience with current external transporters is that cheese is unlikely to be contaminated during transport. This consideration is based on experience unloading deliveries, each one of which is visually inspected before it is put away by hand. With regard to NYD's own vans, we have a policy on avoiding contamination during deliveries, which can be found in our 'Avoiding Contamination during Deliveries' in our Policies and Procedures documents. Even though the risk is present, we feel it is insignificant because it is covered by the controls in place at receipt.	
Likelihood	low	low	low	low	
Severity	high	high	low	high	
Total	significant significant		low	insignificant	
CCP or Pre-requisite	Pre-requisite Pre-requisite Pre-requisite		Neither	Pre-requisite	
Record	Product specifications and supplier risk analyses. End-product testing and its verification.	Test results for cheeses that are bought on from producers on a positive-release basis	Training record for cheeseshift checkin team members.	NYD van cleaning sheets.	

Process Step	5	6			
RECEIPT BY NYD		6 STORAGE AND MATURING			
Description of Risk	Receiving cheese that has been physically contaminated at source or during transport	Microbiological contamination during storage from staff, work surfaces, maintenance work, outside contractors.	Cross-contamination of pathogens between batches of the same type of cheese during rind washing	Growth of pathogens during storage	Physical and chemical contamination of cheese during storage
Risks					
Microbiological - Pathogens		Salmonella, Listeria monocytogenes, Staph. aureus.	E.coli O157, Salmonella, Listeria monocytogenes, Staph. aureus.	Salmonella, Listeria monocytogenes, Staph. aureus.	
Chemical	pre-receipt	n/a	n/a	n/a	cleaning chemicals
Physical - Glass	pre-receipt	n/a	n/a	n/a	breakages
Physical - Metal	pre-receipt	n/a	n/a	n/a	small items
Allergens	pre-receipt	n/a	n/a	n/a	allergens
Assessment of Risk and Control Measures	This risk can be controlled with a CCP. Cheese is visually inspected then unpacked and put away by hand. It is unlikely that a chemical smell or visual evidence of other contamination would be missed during this stage. Deliveries or parts thereof deemed to be critically contaminated will be refused. For our detailed policy covering receipt of cheese, see 'Cheese Receipt Procedure CCP1' in our Policies and Procedures documents		This risk is not appropriate to be managed by a CCP. It is however mitigated by our supplier approval process and the following pre-requisites: rind washing procedure, personal hygiene and cleaning procedures. Cheeses are split into lots which are washed together to limit risk in case of a problem (all affected batches will be discarded). For further information see For more information see our Policies and Procedures documents.	at temperatures outside those which control pathogen growth. The risk is controlled by our	This risk is addressed by the following pre-requisites and quality management systems: chemical control and cleaning procedures, glass and small items control, allergen & personal medications policy, and pest control. For further information see For more information see our Policies and Procedures documents.
Likelihood	low	low	medium	low	low
Severity	high	high	high	high	high
Total	significant	significant	significant	significant	significant
CCP or Pre-requisite	ССР	Pre-requisite	Pre-requisite	Pre-requisite	Pre-requisite
Record	Our computer software requires that the receiver has checked the state of the delivery and the temperature it came in at (if appropriate).	Visitor logs, departmental cleaning sheets, cheese care procedures, and personnel training logs. End-product and environmental testing act as verification.	Batch information that is logged on our software system and that allows us to trace	Absence of pathogens is verified through end-product testing.	Departmental glass checks, personnel training logs.

Process Step	7 8	9	10	11
Process Step	CHEESE SELECTED CUT FOR SALE	9 WRAP	LABEL	PACK IN BOXES / CRATES
Description of Risk	Microbiological contamination (from staff and work surfaces) and physical contamination occuring during packing	Nitrogen & carbon dioxide mixture gas is used for gas flush wrapping in some scenarios	Customers are not accurately notified of allergens in a product.	Microbiological contamination (from staff and work surfaces) and physical contamination occuring during packing
Risks				
Microbiological - Pathogens	Salmonella, Listeria monocytogenes, Staph. aureus.	Clostridium Botulinum in an anaerobic environment		Salmonella, Listeria monocytogenes, Staph. aureus
Chemical	cleaning chemicals	n/a	n/a	cleaning chemicals
Physical - Glass	breakages	n/a	n/a	breakages
Physical - Metal	small items	n/a	n/a	small items
Allergens	allergens	n/a	allergens	allergens
Assessment of Risk and Control Measures	These risks are not appropriate for management through CCPs. They are addressed by a series of pre-requisites and quality management systems. These include: personal hygiene policy, protective clothing, chemical control and cleaning procedures, glass and small items control, allergen & personal medications policy, and pest control. For more information see our Policies and Procedures documents.	Procedures are in place for the use of the equipment and staff are trained to use it correctly. Nitrogen gas used in this way is not a food safety risk. For more information see our Policies and Procedures documents. Gas Flushing risk assessment covers the pathogenic risk.	specific about the presence of allergens and requires them to be setup in the system	These risks are not appropriate for management through CCPs. They are addressed by a series of pre-requisites and quality management systems. These include: personal hygiene policy, protective clothing, chemical control and cleaning procedures, glass and small items control, allergen & personal medications policy, and pest control. For more information see our Policies and Procedures documents.
Likelihood	low	low	low	low
Severity	high	low	high	high
Total	significant	low	significant	significant
CCP or Pre-requisite	Pre-requisite	Neither	Pre-requisite	Pre-requisite
Record	Personnel training logs, pest control reports, departmental cleaning sheets, end-product and environmental testing acts as verification.	Personnel training logs	Product Specifications	Personnel training logs, pest control reports, departmental cleaning sheets, end-product and environmental testing acts as verification. 2

Process Step 12 13				
riocess step	OUTGOING DELIVERY	RETURNS TO STOCK		
Description of Risk	Physical contamination or growth of pathogens during transport	Contamination of cheese while it is out of our care; introduction of pathogens or physical contaminants to NYD stock		
Risks				
Microbiological - Pathogens	Salmonella, Listeria monocytogenes, Staph. aureus.	E.coli O157, Salmonella, Listeria monocytogenes, Staph. aureus.		
Chemical	chemicals	chemicals		
Physical - Glass	broken glass	broken glass		
Physical - Metal	small items	small items		
Allergens	allergens	allergens		
Assessment of Risk and Control Measures	For the most part, transport takes place using NYD vehicles which are temperature controlled and whose refrigeration is regularly maintained. Large WS and Export orders are packed on pallets and shipped with refrigerated hauliers. In some cases, smaller parcels are sent with an overnight, unrefrigerated courier. This is permissable under the Temperature Regulations as distance selling. When required, ice packs are included in these parcels to lower the temperatures of the parcel before and during delivery. We also periodically monitor the temperature of unrefrigerated couriers and the utility of the ice packs. When wholesale or mail order items are dispatched via third-party couriers, they are packaged in tamper-evident packaging which lowers the risk of physical contamination.	Risk is controlled by correctly following the stock returns procedure. Only staff trained to accept stock returns are authorised to carry out this activity. See our Customer Returns Procedure in our Policies and Procedures documents for more information.		
Likelihood	low	low		
Severity	high	high		
Total	significant	significant		
CCP or Pre-requisite	Pre-requisite	Pre-requisite		
Record	NYD van cleaning sheets and temperature logs.	Our computer software requires the filling out of a returns form.		

CCP No	PROCESS STAGE	SIGNIFICANT HAZARD	CRITICAL CONTROL AND CRITICAL LIMIT	MONITORING	CORRECTIVE ACTION	VERIFICATION
1	Receipt of delivered cheese for resale.	The presence of external critical contamination (chemical, glass, metal or pest matter, or physical evidence of allergen contamination) on delivery.	Absence of chemical, glass, metal, pest matter, or presence of allergens upon delivery.	Confirm on database presence/absence of critical contamination with tick box procedure. See Section 8.1 in the Policies and Procedures document for more information.	1. Re-check whole delivery. 2. Isolate and quarantine contaminated product(s). 3. Any of Directors / QA / Buying / Cheeseshift to determine use or disposal. 4. QA / Buying to carry out any necessary investigation.	Absence of customer complaints. 2. Weekly cheese tasting. 3. Internal Audit

Pre-requisite programmes are in place for the following:

Training

All employees are on a training schedule to receive training in the following:

Induction, initial and ongoing on the job training

Basic Dairy Hygiene

Intermediate Training including:

- Intermediate Dairy Hygiene
- HACCP Training
- Health & Safety
- First Aid
- Equipment- and Role-Specific Training

Working Practice

Instructions are in place and training is carried out to ensure that all employees and persons who enter the premises follow the requirements for personal hygiene.

We have policies covering Fitness to Work, Protective Equipment, Health & Safety, Personal Medication and Visitors.

Cleaning and Sanitation

Cleaning procedures have been written and are followed.

Checks are carried out by supervisory staff.

A master sanitation schedule is in place.

We have an Environmental Testing Regime in place for our sites for cleaning verification.

Procedures are in place to assure the segregation and proper use of non-food chemicals in the plant, including cleaning chemicals.

Allergen Management

Polices and procedures are in place to control the risk of contamination with allergens at all stages in the process.

Allergen information on labels and NYD materials is legal, consistent and accurate

Process, Environment & Equipment Control

All raw materials are stored under sanitary conditions.

Preventative maintenance and calibration schedules are established and documented.

Temperature and humidity are monitored and logged daily in all sites.

Procedures exist and are followed for cheese handling, maturation, selection, packing and despatch for customers, both on and off site.

Procedures exist for verifying our outbound weighing equipment for compliance with legislation.

Supplier Approval Policy

Visits are made to suppliers and comprehensive product information has been collected and is being updated.

Checks are made on suppliers according to risk according to the supplier risk assessment, updated annually.

NYD requires suppliers to provide evidence of product without hazardous pathogen levels and has requested details of supplier HACCP systems and third party audits.

We have a non-resale buying policy for non-food items.

Specifications for raw materials and packaging materials are kept on file.

Pest Control

Effective pest control programmes are in place.

Procedures are in place to assure the segregation and proper use of non-food chemicals in the plant, including:

- Pesticides.
- Baits used in and around the premises.

Production Equipment

Equipment is constructed and installed according to sanitary design principles.

Maintenance

Preventative maintenance and calibration schedules are established and documented.

Maintenance is performed in such a way as to minimise risk of product contamination.

Vehicle Management, Storage and Distribution

Drivers are trained in how to load and unload their vans to ensure the safety of the product

Traceability and Recall

All raw materials and products are lot-coded and a recall system is in place so that rapid and complete traces and recalls can be done when product retrieval is necessary. Goods sent to wholesale customers are labelled in a way that conforms to legal requirements and permits identification of the lot-code for traceability purposes.

Manufacturing and Finished Product Specifications

NYD holds specifications for all raw materials and finished products

Labelling Control

Procedures are in place to ensure all product labels & labelling information at point of sale, including ecommerce documentation legal, consistent and accurate.

Site Structure, Layout and Methods of Working

The establishment is located, constructed and maintained according to sanitary design principles.

There is a linear product flow which makes use of designated procedures and directions of operation to minimise cross-contamination.

Wooden pallets are controlled on receipt. No pallets in a state of bad repair will be accepted into the building.

We have a broader procedure for handling all bits of wood in the business.

Metal and Glass Contamination procedures exist to eliminate the risk of these contaminants appearing in our product.