

PROTOCOL FOR SPOT BUYING OF PRODUCE TO BE USED AS READY TO EAT

CFA members are required to use raw materials sourced from reputable approved suppliers, and therefore have procedures in place for their approval. For produce this includes compliance with CFA's '[Microbiological Guidance for Produce Suppliers to Chilled Food Manufacturers](#)'.

The supply of produce is therefore through strategic suppliers, who work with the chilled food manufacturers to develop a sourcing strategy by programming crops to ensure a safe and secure supply. Specifications **MUST** be agreed to ensure the expected standards to deliver food safety and quality. Supplier performance is monitored and measured and regularly reviewed to build strong supplier relationships and continuous improvement. This approach also ensures long term procurement.

However, in some extreme circumstances *ad hoc* purchases or 'spot buying' may be required when there is an immediate need through unplanned emergency events such as crop failure.

There **MUST** be collaboration with all stakeholders to ensure all minimum requirements continue to be met.

In these events there **MUST** always be a pre-planned pre-approved protocol in place to temporarily approve these spot purchases to ensure food legality, safety (including to any high risk customers, e.g. healthcare) and quality at all times. These events **MUST** be documented, monitored and reviewed to give improved control and visibility of when, how and why these events happen and how they can be better controlled / avoided in future.

Spot purchasing must only be used as a last resort. Food safety is paramount.

All spot-bought materials MUST comply with legislative requirements and meet standards specified by/agreed with customers.

All customers **MUST** be notified of the spot purchases and approval sought. Individual Customers may have their own standards which will have to be complied with, e.g. Tesco NURTURE programme, Marks and Spencer Select Farm Produce and Global sourcing principles.

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A. CORE REQUIREMENTS

1. Obtain certifications

FBOs carrying out spot buying **MUST** compile due diligence material on their suppliers.

It is highly desirable that suppliers comply with one of the following certifications:

- Growers: benchmarked with Global GAP (GG, non-UK) or Red Tractor (UK)
- Post-harvest: BRCGS, GFSI or GG Chain of Custody.

Certification on ethical matters through Sedex, GRASP or SMETA is highly desirable. Requirements of these schemes can be verified through using of a questionnaire covering the [ETI base code](#).

Specific requirements, e.g. organic, GM-free, **MUST** be certified as being compliant with UK/EU/US legislation and divergence from UK legislative requirements **MUST** be addressed.

Organic produce **MUST** have a valid certificate issued by a recognised control body listed at www.gov.uk/guidance/organic-food-uk-approved-control-bodies, e.g. Soil Association, Organic Farmers and Growers CIC, Organic Food Federation. This certification **MUST** be accompanied by results of a multi residue screen analysis for the crop supplied.

All certifications **MUST** be checked against the relevant website for authenticity, validity and scope of the audit.

Environmental and fair trade labels may be applicable for a limited number of products or suppliers, e.g. Leaf Marque, Rainforest Alliance, Fairtrade Foundation.

See Section B for more information on example relevant schemes.

a) Microbiological Safety

Control elements that require particular review and a more detailed assessment for **the particular crop being spot purchased** are dependent on risk presented by the crop, and include:

- Use of composted animal manure in the last 24 months.
- Have crops been affected by any adverse weather conditions / flooding.
- Field location and wild animals and bird activity.
- Equipment used and condition
- Water source(s) and method of application,
- Harvesting methods, crate hygiene and handling
- Health screening, toilet and hand washing facilities.
- Method of cooling, storage facilities,
- Post-harvest handling and processes
- Transport and chill chain
- Hygiene of packhouses.

Use of manure of any kind, or of sewage sludge MUST be investigated as MUST irrigation water sources.

The produce should undergo microbiological testing by the receiving company. Results of testing by the supplier/grower **MUST** be requested and if supplied and only if acceptable shall the produce be used.

Table 1: Microbiological Food Safety – Critical and Optional Information Requirements

Factor	Critical	Requirement by Risk Assessment (by Red Tractor RA)		
	Required in all Purchase	High Risk (Cat 0/1)	Medium Risk (Cat 2)	Low Risk (Cat 3) ¹
Use of composted animal manure in the last 24 months	YES			
Have crops been affected by any adverse weather conditions / flooding	YES			
Water source(s) and method of application	YES			
Field location and wild animals and bird activity		YES	Optional	Not required
Equipment used and condition: provide records of food contact equipment maintenance and cleaning schedule adherence		YES	Optional	Not required
Harvesting methods, crate hygiene and handling		Optional	Optional	Not required
Method of cooling particularly where water-based cooling systems are used , storage facilities		YES	Optional	Not required
Post-harvest handling and processes		Optional	Optional	Not required
Transport and chill chain: Temperatures of incoming product measured and recorded against an agreed specification on intake at the receiving site		Optional	Optional	Not required
Hygiene of packhouses		Optional	Optional	Not required

b) Pesticide residues and contaminants

Pesticide residues and contaminants are a major concern for produce suppliers.

A plant protection product list (PPPL) **MUST** be supplied for review unless a spray record is supplied for the purchased crop. The PPPL is a list of products that the grower intends to use on the crop e.g. pesticides, herbicides, insecticides, fungicides, biological agents, post-harvest products either used in the field or harvested products.

If a spray record for the purchased crop is received and any concerns are flagged on review, then the latest multi-residue testing results should be acquired or carried out by the receiving company and reviewed.

Only if acceptable shall the produce be used. The focus with respect to plant protection products should be on those listed on [Food Experts](#), with particular attention being paid to the availability of a recent residue certificate for that crop and a recent spray record for the crop to enable verification.









c) Quality standards and Specifications

The consignment **MUST** meet minimum legal standards in addition to the relevant quality and labelling requirements. These can include being free from pests and foreign bodies, damage, bruising, browning etc.

Communication issues **MUST** be avoided, and expectations confirmed within a specification that is agreed by both parties. The material **MUST** always meet minimum legal standards.

¹ If there is evidence of a Category 3 crop being used as RTE this **MUST** be taken into account.

B. FURTHER INFORMATION ON STANDARDS REFERRED TO

<p>Global G.A.P.</p> 	<p>A standard to guarantee Good Agricultural Practices and a minimum requirement for produce. It includes product traceability, environmental measures and responsibility for the health and safety of employees.</p> <p>www.globalgap.org/uk_en</p>
<p>Red Tractor – Assured Produce</p> 	<p>The Red Tractor Assurance Schemes exist to certify and signify the compliance by each of its members to a series of rigorous standards that apply to different farming enterprises and different steps within the food supply chain.</p> <p>https://redtractor.org.uk/</p>
<p>GFSI / BRCGS</p> 	<p>To ensure good practices in food safety, suppliers need to have a HACCP-based food safety management system. This is particularly important for packing and processing facilities. Management systems should be recognised by the GFSI (Global Food Standards Initiative). Certification for the UK is BRCGS (Better Regulatory Compliance Global Standard).</p> <p>www.brcgs.com/our-standards/food-safety</p>
<p>SEDEX / SMETA</p> 	<p>Sedex is an ethical trade membership organisation. The Sedex Members Ethical Trade Audit (SMETA) is a leading ethical audit focusing on the social conditions in supply chains. It has become a standard audit for product to achieve retail standards.</p>
<p>Ethical Trade Initiative</p> 	<p>Many retailers are members of the Ethical Trade Initiative (ETI) and have adopted the ETI Base Code:</p> <p>www.ethicaltrade.org/eti-base-code.</p>
<p>The LEAF Marque</p> 	<p>The LEAF Marque (Linking Environment And Farming) is an assurance system for sustainably farmed products with an integrated farm management approach. The Marque has had the most impact on British farms but is expected to become more significant for global growers.</p> <p>https://leaf.eco/farming/leaf-marque</p>
<p>Rainforest Alliance</p> 	<p>The Rainforest Alliance has already built a name in the banana trade, but new products are being added, such as avocados.</p> <p>www.rainforest-alliance.org</p>
<p>Fairtrade</p> 	<p>Fairtrade labels are mainly related to the banana trade, however other types of produce are being included e.g. tomatoes, green beans, oranges and grapes.</p> <p>www.fairtrade.org.uk</p>