



HACCP QUALITY CONTROL SYSTEM

COMPANY NAME : REM SPROUT srl

TYPE OF COMPANY: PRODUCTION AND SALE OF ORGANIC AND CONVENTIONAL SPROUTING SEEDS

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LIST OF AUTHORIZATION OF REM COMPANY

1) ORGANIC NOTIFICATION No. CP85 FROM CCPB srl OF BOLOGNA

REM SPROUT SRL is world trading and producing company, which has been started working in sprouts. Today REM SPROUT SRL is proud to collaborate with the most important seed companies all over the world , and it is gradually widening more and more his experience and technical professionalism.

This program wants to illustrate the various steps that build up the seed used for food purposes , since its contribution physicist at our storage facilities until final sale to third parties , passing through the phase of analysis and processing of the products .

SUPPLIER VERIFICATION PROCEDURE

This procedure defines the general criteria , responsibilities and operating procedures adopted by REM SRL to manage and control all phases of the evaluation process , qualification and monitoring of suppliers and to maintain a list of suppliers for the quality of their product. In this case, REM has two distinct types of providers, as follows:

SUPPLY OF AGRICULTURAL PRODUCTS ALREADY SELECTED, PACKAGED, READY FOR SALE.

If you buy a product to market, that is a finished product already cleaned and packed , the first analysis of the supplier is if the vendor holds a food notification , or if our supplier is authorized to trade and to produce seed for food use. The first criteria (often almost the only adopted) is to ensure that the company where the seeds come, is a monitored company , which works in according to U.E regulation, and it is therefore in possession of a valid notification. Suppliers are an integral part of the production process and organization of our company and therefore should be selected so as to provide the maximum possible guarantees that the seed to sprout is authentic . The evaluation of the supplier is done by the purchasing department of REM and the result is based on:

- Historical data;
- Direct visit to the provider;
- Evaluation of the product / service;
- Evaluation of the third party or market
- Adherence to the technical specifications of the product ;
- Compliance with the terms of delivery;
- Products supplied ;
- Business structure and technical production ;

- Availability of an apt documentation (especially concerning to the notification as food company)
- The price and terms of payment ;
- Availability of after-sales structure

For us, a discriminating term is also the distance of our supplier , In fact we prefer working with companies in our area , in this way also the slightest problem can be timely meted and solved , minimizing any costs.

SUPPLY OF AGRICULTURAL PRODUCTS IN NATURE

Concerning the farms , which represent two-thirds of the seeds supply for food use , the supplier evaluation is done on a basis more strict and distinct , that we will try to sum as follows:

- the historicity of the relationships
- the qualification of the farm companies, in particular we consider the various licenses and licenses in possession of the farm
- corporate location and ability to provide the desired insulation ,
- the company's resources (size, human resources, machinery , irrigation availability and structure , facilities) ,
- experience in other sectors ,
- the compliance with the statutory and regulatory requirements (notebook, waste management , use of phytosanitary products)
- the presence of documentation / records (extracts of the map, plant health license)
- Proximity to the company.

Since farms are considered as our usual supplier , they are first evaluated for some important issues which are checked and consider from our production department through an inspection before agreeing to any type of commercial contract with the farm . The visits by our technicians are about once a month during the period of sowing and growth of the seed. Of course, if there are some phytopathological and growing problem on the crops, our technicians intensify the field inspections to once a week. In general , the technicians measure and test the following items :

Soil management and environmental protection

The soil must be protected from erosion and waterlogging by providing an appropriate accommodations to hydraulic agricultural water regulation both superficial and deep . The work must be performed by avoiding any eart-moving of the soil which can modify the profile of the surface layer, burying underground the more fertile bed of earth.

Mulching with crop residues and other natural materials is a recommended practice , while the use of synthetic materials should be limited to particular needs , with the obligation of recovery at the end of the crop cycle . The use of PVC is prohibited.

Tillage

The work must be performed in order to obtain the greatest benefit on fertility and soil structure , minimizing the negative effects on the environment.

In particular, farmers should try to avoid the use of machinery and equipment which cause excessive silting of the active layer (working at greater depths than 25-30 cm), destroying the soil structure .To ensure

maximum compliance with the fertility of the soil chemical and physical techniques can be used to minimum tillage (minimum tillage) or no-tillage (zero tillage) .

Farming rotation

For the many positive benefits (fertility preservation chemical and physical containment of herbaceous and parasitic infestations , increase in yields) , the crop rotation is a fundamental practice .

Fertilizations

The provisions of fertilization for agriculture for food that we try to respect are the same which governing organic production.

Maintaining or increasing the fertility of the soil, it should be promoted through organic fertilization and , preferentially , by:

- a) cultivation of legumes, green manures or deep -rooting plants in an appropriate multi-annual rotation program ;
- b) incorporation of the soil of organic materials , composted or not , produced by companies that operate in compliance with applicable rules on organic farming.

Irrigation

The use of irrigation water must be reduced by the adoption of appropriate cultivation techniques of irrigation .

Our farmer have not to use any plastic pipes : it is allowed to use plastic (except PVC) s subject to the obligation of recovery at the end of the cycle.

Weed control

The weeds must be controlled by one of the following practices :

- a) pirodiserbo ;
- b) termodiserbo ;
- d) agronomic practices (rotations , intercropping , mulching , grassing checked , false sowing , use of seeds with high purity , adequate control of meteoric waters and irrigation management) .

Any use of synthetic herbicides is forbidden.

Techniques of maturation and storage

Any use of synthetic chemicals to anticipate the maturity is forbidden, also during the post-harvest and storage , and the use of ionizing radiation for conservation purposes .

This is the overview to which we refer in our choice of partners. Of course, every choice is questioned when there is any kind of risk, also the lightest that the purchased product to / from REM SRL does not have the minimum quality requirements .

PHASE I : RECEIVING PRODUCTS AT WAREHOUSE No. 2

- Read the documentation which going with the goods directly attributed to the company by an intermediary or by the individual farmer .
- Verify the integrity and the information regarding the packaging in which the seed is placed .
- The seed is weighed again at the time of disloading to check that the weights correspond with the ones stated in the document of conferring goods.

CORRECTIVE ACTIONS OF TRACKING '

The logistic office , at the time of unloading of the goods , automatically confer a number of lot that it is progressive to identify the grower - supplier which is written also on REGISTRO CARICO SCARICO. The

lot indicates the seed variety, and in any time from now on, it is possible understanding the entire history of the seed, being able to demonstrate traceability at all stages of the processing. The register number of loading and unloading along with its related lot is noted on the folder outside of the bag, in which it is already recorded the weight and the supplier.

PHASE II : SAMPLES

Before stocking the goods, we go on taking 1 sample of about 50-100 gr. The amount of the sample is constituted by a multiple sampling from each bag, so the sample may be representative of the entire lot. The seed sample is placed in a league hygienic bag folding on which we put a label with references and name of seed supplier. One sample of the seeds is used for internal use to check purity and germination in our laboratory and another one is for the external laboratory that will check the lack of virus.

PHASE III : STORAGE WAREHOUSE at No. 2

The seed is placed in a dedicated warehouse where pallets raise above the ground of about 20 cm and from the wall about 20 cm. The precise location of storage depends on whether the seed has been forwarded already selected or if it has been given in nature. The exact location of the seeds is reported to the office and recorded about the exact location of the seed so that it can be recognized at any time.

Depending on whether the seed has been received already selected or not, we proceed with the processing step:

III PROCESSING

The seed is taken from the storage and prepared for the cleaning machine. In order to avoid contamination we use a cleaning machine only for organic sprouting seeds and another only for conventional sprouting seeds. The person in charge, before making any kind of working, has previously verified that the machine can't give rise to any kind of contamination with other seeds, carrying out through cleaning of the machine. The same operation is repeated at the end of work. The machines dedicated to the processing of the seed for sprouting are the following:

- Tarara
- Densimetric
- Cylindrical
- Helical

At the beginning of the process, the operator of the cleaning processing has a company paper, where every records are put in. The gross weight at the beginning of processing, the standard deviation obtained, and the net weight got for each package and the weight of the final net proceeds. The clean seed, finished the processing will be stored in big bags in the warehouse packing / storage. Before moving the seed, we take two samples of about 50-100 g each. The seed is placed in a league hygienic bag folding in which there is a label reported with reference to lot seed (and lot code and the total weight of the consignment and supply name). The first is directly tested in our laboratories to verify purity germination after the post-cleaning, while the second sample is sent by courier at the laboratory:

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REGGIO EMILIA - ITALY

For the analysis that exonerate the seed from contamination, in particular the exemption from SALMONELLA & ESCHERICHIA COLI.

Waiting the result of the analysis from the laboratory, the seed is stored in the storage warehouse.

IV PACKAGING

As soon as we receive the analysis of the batch, we proceed with the packaging of the seed. The big bag is placed next to the electronic balance, and the employers pack the bags by hand using a bailer dedicated exclusively to the seed for sprouting. The bags are clearly provided by companies certified as SACCHIFICIO VENETO which has the certification of:

UNI EN ISO 15593:2008 FOR FOOD PACKAGING

The bags are manually sealed with a stapler dedicated to the line and on them is affixed a label depending on whether the seed is Organic or conventional. In the first case, the labels have been authorized by "SUOLO e SALUTE", while in the second case are made by our office, according to the international rules. In both cases, it is shown very clearly visible, the species and variety of seed, net weight / loading / unloading and the number of the lot, together with the weight of each package (usually 5/10/25Kg), year of manufacture and the words that the seed is not treated. Each label in order to ensure traceability, is equipped with all the references of REM SPROUT SRL, including the license seed, in the case of biological or organic seed. After that, the bags are placed on pallets, wrapped and restocked again waiting to be shipped.

Fifth : SALE

At the time of loading, the office provides to the warehouse's workers, a packing list and invoice in which appear all the data of the transition, i.e. the lot, registration, loading and unloading for traceability, quantity, number of packages, net weight final, and final destination of the goods. Along with the invoice, the documentation of the sale which is attached to the pallet consists of packing list, a copy of the analysis with the results received, in the case of organic seed, you shall also provide a certificate of conformity of the producer.

PROCEDURE FOR WITHDRAWAL / RECALL

The goods in output is accompanied by analysis with which it is shown that the goods are free from viruses. Upon receipt by the customer, the seeds are usually tested also in the destination country. If the outcome should be positive, following the procedure of withdrawal / recall:

- The customer shall notify us by telephone and subsequently received via email that the batch tested positive to the analysis. At the same time send to our knowledge, a copy of the analysis.
- The customer is required to suspend any activity undertaken with the contaminated batch. From our side, as soon as we receive a pre-alarm we promptly notify the problem to AUSL
- Together with the AUSL is established remediation action, trying to rebuild every action of the contaminated batch, asking the client to withdraw all the contaminated batches from the market.
- REM SPROUT send immediately a sample of the batch once again to STUDIO ALFA, in order to re-check again the presence or absence of the virus.
- We promptly organize by ourselves at our expense to return back the contaminated lot by one of our trucks to pick up the goods without wasting time, avoiding that is erroneously placed on the market by our end customer.
- Waiting for the analysis, once the goods arrive at our warehouse, they are stored in a specific area called "area of contamination" and stay there until the arrival of the analysis, without being brought into contact with anything else.
- When the result arrives, we decide to ship again the goods to the customer because they are actually negative, or in the case of contamination, we proceed immediately to contact the company REM srl of Cesena which provides for the removal of the goods.

VI : DEADLINES

According to the international rules, germination and purity, unless there are complications, is guaranteed for two years from the time of packaging. For this purpose, to always maintain a high level of quality of our seed, stored goods are periodically checked every six months. From each bag or big bag stored for more than six months, we take 2 samples of about 50-100 g each. The first is directly tested in our laboratories to verify that the germination and purity remained unchanged, while the second sample is sent by courier at the laboratory:

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for the analysis of contamination.

VII CLEANING PROCESSING

The routine cleaning of the premises is one that is carried out every day and every week . Before the closure of the local we remove dust or garbage by brooms, shovels and if necessary by washing the floor with water , taking care not to touch the platforms with the stored goods . In the warehouse there is a special drum pedal. Every day we make the removal of the dust and clean the counters . Concerning the clearing machines that select the seed , the removal of dust is making by compressed air. The cleaning is made every time we finish the selection process of each variety of seed.

Fight against insects and mouses :

The location is currently being monitored by DODO SRL Cesena , a company authorized to fight against rodents , and when there is an ongoing program of rodent control for a period of one year , with visits REM SPROUT every two weeks if there is a critical case , up to get to once a month in case of lower danger.

VIII INTERNAL TRAINING

REM SPROUT SRL has formed internally its employees how working with sprouting seeds. The staff has been equipped with gown, cap and has free access to the water point which is located at the storage facility . Every time they manipulate seed they wash their hands before and after contact , as it is necessary to do the utmost care not to put the seed in contact with food with any other possible source of contagion or heat may alter its original features . The openings , windows, or doors that are found in the structure must be strictly kept closed and, avoiding the risk that any unauthorized person take access .