General Mills Global Packaging Supplier Manual

QRO Packaging Management
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GENERAL MILLS GLOBAL PACKAGING SUPPLIER MANUAL CONTENT

As part of the ongoing focus on our supplier food safety and quality assurance program, the General Mills (GMI) Global Packaging Supplier Manual has been created to bring clarity to key program requirements.

Enclosed you will find the GMI Packaging Supplier Manual containing standard quality and food safety requirements for all packaging vendors. The manual sets forth standards for current and future specifications, and shall be considered to be a critical component of all GMI Packaging Specifications. In this manual you will find an overview of quality and food safety requirements, expectations around communication of changes and process for exceptions. Any change that may affect the specification, food safety or composition such as material change, allergens, producing location, pack size, etc. shall be communicated to GMI for approval prior to implementation. See below for further detail on the supplier quality assurance program components.

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GENERAL MILLS PACKAGING SUPPLIER APPROVAL AND MAINTENANCE

All initial vendor approvals for producing locations and/or transfer stations are conducted by a GMI Quality and Regulatory Operations (QRO) Packaging Manager. The approval will begin with initiation of a new supplier survey and request for supporting documentation:

- Plant Organization Chart
- Process Flow Diagram
- HACCP Plan
- Third Party Audit
- A record of your most recent Traceability (mock recall) Exercise
- Hold Procedure
- GMP Policy
- Water Ingress Policy
- Master Sanitation Schedule
- Chemical Management Program
- Trailer Inspection Procedure and Record
- Glass and Brittle Plastic Procedure

These may be submitted to GMI through the GMI Global Audit Program (G-GAP) or sent to the GMI contact that initiated the request. Upon review, an audit of the facility may be conducted with approval for specific packaging materials by producing location and/or line.

SUPPLIER FOOD SAFETY MAINTENANCE PLAN

All approved vendor producing locations for GMI will be re-audited periodically by GMI personnel along with requests for ongoing maintenance documentation.

All approved vendor producing locations for GMI are highly recommended to have a 3rd party audit complete annually. When an audit is requested you will be asked to provide GMI with a third party audit report. This should be submitted via G-GAP or to the GMI contact that initiated the request. Below are examples of audit schemes or audit firms:

- Global Food Safety Initiative (GFSI) audit schemes
  - International Featured Standards (IFS)
  - Food Safety System Certification (FSSC)
  - British Retail Consortium (BRC)
  - Safe Quality Food (SQF)
- American Institute of Baking (AIB)

All 3rd party audits will be reviewed and additional follow up may be required.

We highly recommend that all approved vendor producing locations for GMI have an internal audit program in place.

GENERAL MILLS CONTACTS

Throughout the manual the title “GMI QRO Packaging Manager” will be used frequently when referencing who should be contacted at GMI for various reasons. For regions outside of the US that do not use this title it will apply to your GMI designated contact.

REGULATORY COMPLIANCE

All GMI packaging materials shall meet all applicable regulatory requirements for its intended use. Packaging materials shall be produced and shipped in compliance with applicable local, state, federal and international regulations. It is GMI's policy to comply to the fullest extent not only with the letter but also with the spirit of the laws which govern and regulate the food industry.

All materials supplied to GMI shall be of food grade components and in all respects, including conditions of manufacture, storage, and shipment, be in compliance with the Federal Food, Drug, and Cosmetic Act of 1938 as amended and all applicable regulations thereunder. When the material is intended for use as a direct food contact material, a signed GMI Packaging Material Guaranty Letter, based on its intended food use, must be on file with GMI's Quality and Regulatory Operations (QRO) Department. Suppliers outside of North America shall comply with local regulations and requirements.

FACILITY REGISTRATION

All vendors and locations must be in compliance with the local, state, federal and international licensing and registration requirements. Owners, operators, or agents in charge of facilities that manufacture, process, pack, or hold food for human or animal consumption are required to register the facility under applicable laws and regulations.

REGULATORY CONTACTS

- All GMI suppliers shall have a written policy detailing the procedures and responsible persons associated with a regulatory contact and facility inspection.
- The facility shall keep accurate records detailing regulatory agency visits and the resolution to all findings documented by the regulatory agency.
- All GMI suppliers shall notify their GMI QRO Packaging Manager when any significant regulatory observations are made that would indicate the packaging material may be adulterated or is being prepared, packed, or held under conditions whereby it may become adulterated or rendered injurious to health. This would include all observations noted on a FDA Form 483 and comparable forms globally.
- Duplicate samples shall be taken anytime regulatory samples are pulled along with clear documentation of what is to be tested. This may include duplicates for finished product testing for pathogens, migration testing, environmental sampling, etc.
- A hold and release program shall be in place to accompany regulatory sampling with written clearance by the sampling agency prior to disposition.
- Do not ship any product to GMI until cleared with written authorization by the sampling agency.
- GMI packaging material that has been sampled and partially shipped must be communicated to the appropriate GMI QRO Packaging Manager immediately.
- Packaging material placed on Regulatory Hold while in transit to GMI must be communicated to the appropriate GMI QRO Packaging Manager immediately to ensure hold and clearance prior to use.

To this end, GMI extends complete cooperation to all regulatory officials and/or activities, not only to give the fullest protection to the consumers of our products, but also to retain the confidence and regard of the regulatory agencies.

With this in mind, Quality & Regulatory Operations takes several established precautions to ensure complete compliance and cooperation in any case when a packaging material, either owned by or being shipped to GMI is sampled by the Food and Drug Administration. Accordingly, we are requesting that this office be informed promptly and completely of all Food and Drug Administration inspections of your facilities which involve the sampling of any material being shipped to GMI. Such notifications shall also include occasions where the FDA may ask to see shipping orders and shall observe that specific shipments have been made to GMI. In all cases possible, we would like to have the lot numbers of packaging materials involved in either the actual sampling or the shipping orders observed.

IMPORT REGULATORY REQUIREMENTS

Where GMI is purchasing the packaging materials direct from a foreign supplier, said supplier should comply with all applicable laws, regulations or ordinances of any governmental authority that regulates the import or export of goods and services provided by the supplier, and all reasonable requests from GMI as to the form and manner of such compliance. Such compliance activities shall include, but not be limited to, proper marking of the country of origin of goods, proper labeling, provision of all documentation requested by GMI or as otherwise needed for compliance (such as country of origin certificates, complete product descriptions on invoice) and other compliance measures as required.

CUSTOMS TRADE PARTNERSHIP AGAINST TERRORISM (CTPAT)

As a partner in the Customs Trade Partnership Against Terrorism (CTPAT) program, GMI requires that all U.S. packaging materials purchased directly from a foreign source with GMI as the importer of record (IOR) be shipped in accordance with the guidelines outlined under the CTPAT program.

Import operations manage the initial set up of foreign suppliers shipping products to GMI in the U.S. when GMI is designated as the importer of record. Supplier requirements under the CTPAT program will be communicated as a part of that process and a foreign supplier security questionnaire will be provided for completion. Upon receipt back, Corporate Security will assess the current status of that supplier's supply chain security procedures under the program and provide recommendations for further action as needed to meet minimal security requirements. Suppliers who are not currently certified under the CTPAT program can expect to be placed on a continuing review schedule and should expect and plan for an on-site security assessment to verify the security information provided and the adequacy of site security and logistics programs.

Where packaging materials are purchased from a foreign source and GMI is not the importer of record the supplier must still comply with all applicable GMI standard requirements and ensure the safety and security of the product in accordance with GMI's policy.

Further information on the program is available by accessing the Customs and Border Protection website at http://www.cbp.gov/CTPAT.

PRODUCT CONTROL, TRACEABILITY AND RECALL REQUIREMENTS

All suppliers shall have:

- An effective traceability program that includes identification, code dates, lot numbers, and documentation for raw materials, packaging, premiums, finished product, and rework
- A documented and effective product recall, market withdrawal, and stock recovery program
- Ability to identify, stop distribution, and notify customers and consumers by code date within 24 hours of identifying an actionable problem
- Ability to trace one step back from receipt and one step forward from shipping
- An annual traceability exercise program that identifies gaps, and documented corrective action taken

FDA REPORTABLE FOOD REGISTRY

- North American suppliers are required to report adulteration that would present a Serious Adverse Health Consequence such as death, permanent injury or irreversible harm (i.e. Class I Recall and BT Act language)

Steps in the process:

1. Determine scope of issue and, most importantly, perform full risk assessment with this frame of mind
    1. Would situation lead to a serious adverse health consequence?
    2. Is it exempt from reporting? It is exempt if: (a) the adulteration originated with you (i.e. not a supplier); (b) you detected the adulteration prior to any transfer of your product to another person; and (c) you corrected the adulteration or destroyed your adulterated product.
2. Discuss with impacted customers & suppliers
    1. GMI would expect discussion prior to reporting (if needed, use 24 hour contact line 763-764-5050)
    2. Decision resides with you
3. Report issue into food registry within 24 hours of determining reportability
    1. Make sure to retain issue number for communication to others
    2. Expect near immediate action from FDA
    3. GMI available for assistance

HOLD PROGRAM

All suppliers shall have:

- A documented hold program that effectively identifies, isolates, and maintains control of any substandard packaging material due to potential quality or food safety issues

- A hazardous hold procedure that provides additional controls for packaging material security, physical inventory counts and procedures for witness destruction
- An effective disposition process that ensures only authorized personnel disposition hold products, disposition instructions are followed, and documentation is maintained
- A procedure for handling products that are on hold for multiple reasons
- All suppliers of printed packaging materials should have a policy documented and in practice for the secure destruction of materials that contain printing or graphics that imply the materials are connected to GMI. This would include but is not limited to rejected and overrun materials. Destruction should ensure that the materials could in no way be reused.

GOOD MANUFACTURING PRACTICES AND SANITATION

All GMI packaging materials shall meet all applicable regulatory requirements for its intended use and in all respects in compliance with the Federal Food, Drug, and Cosmetic Act of 1938 as amended and all applicable regulations for the country of manufacture and country of sale. All materials shall be processed/converted, packed and stored under strict sanitary conditions in accordance with FDA current Good Manufacturing Practices, Title 21 CFR Part 110 and CFR Title 9 Part 416 or equivalent based upon the country of manufacture and country of sale. Facilities must develop and implement an effective, documented sanitation and GMP program to ensure regulatory compliance, food safety and sanitary conditions of the facility.

- Grounds and exterior structure shall be designed and maintained to provide protection from environmental elements, pest entry and harborage
- All openings shall be properly sealed and/or screened at all times
- Roof shall be accessible and well maintained
- Interior structures shall be designed and maintained to be impervious and cleanable
- Facility shall be maintained to be free from loose paint, rust and/or other debris that may contaminate product zones
- Water leakage, condensation, and/or drain back-ups shall be controlled through a documented program to prevent product contamination or microbiological hazards
- Traffic patterns of people, machines and materials shall be controlled to prevent contamination
- Hand wash stations shall be adequately located and maintained in good repair

EQUIPMENT AND MAINTENANCE

- Equipment shall be designed and maintained to prevent product contamination
- An effective preventive and corrective maintenance program shall be in place
- Procedures should be in place to ensure adequate tool controls as well as appropriate cleaning and sanitizing prior to production
- Lubricants shall be designated for use and adequately controlled
- Temporary repairs shall be documented and effectively managed
- A calibration program shall be in place for all sensitive equipment

PERSONNEL PRACTICES (EMPLOYEES, CONTRACTORS, TEMPORARIES, VISITORS)

- Training and education program shall be in place around GMPs
- Health policy shall be in effect to prevent spread of infectious or communicable diseases
- Compliance to general cleanliness practices and wear clean outer garments
- Compliance to documented personnel practices

OPERATIONAL AND STORAGE PRACTICES

- Waste materials shall be identified and adequately controlled
- All materials shall be received, stored and used so as to prevent contamination

- 18” (or 45 cm) perimeter shall be maintained around in warehouse and storage areas (or per Regional requirement)
- Physical storage conditions shall be maintained to ensure material integrity. Materials should not be stored on the floor.
- Permanent storage surfaces and racking shall be clean, in good condition and not made of wood
- Raw and finished goods shall be segregated to avoid the potential of contamination

CLEANING AND CHEMICAL CONTROL

- An adequate, documented cleaning program shall be in place to cover daily and non-daily tasks
- Procedures should be in place to verify effectiveness of cleaning procedures
- Documented chemical control program shall be in place including approved chemical list, inventory control, preparation and usage

INTEGRATED PEST MANAGEMENT

- An effective, documented pest control program shall be in place including:
    - Current and correct pesticide labels
    - Pesticide application consistent with labeling requirements
    - Accessible MSDS for each pesticide
    - Application records kept in accordance with regulatory requirements
- Program shall be supported by a licensed, certified applicator
- An effective, documented insect control program shall be in place including:
    - A schematic of any insect traps
    - Periodic maintenance of traps
    - Documentation showing catches
    - Trend analysis of trap history
- An effective, documented rodent control program shall be in place including:
    - Ability to identify and address rodent activity
    - Observations that support rodent activity is under control
    - Toxic baits on the facility grounds are adequately controlled to prevent contamination and ensure personal safety (toxic baits should not be used inside the facility)
    - A schematic of rodent traps and bait boxes
    - Periodic maintenance of rodent traps and bait boxes
    - Documentation showing catches
    - Trend analysis of trap history
- An effective, documented program to control birds and other wildlife

TRANSPORTATION AND LOGISTICS

The packaging supplier shall be solely responsible for the sanitary condition and acceptability of the vehicle when loaded and ensure compliance with GMI specifications, regardless of the origin of the vehicle or any previous cleaning which it may have undergone. GMI shall not incur any cost resulting from a packaging supplier's failure to meet GMI specifications. All packaging materials must be stored and shipped in a manner to provide adequate protection from potential physical, chemical, or biological hazards. The container in which product is shipped shall not negatively affect the quality of the material upon arrival at final destination. These requirements apply to all types of shipping containers.

VEHICLE ACCEPTABILITY

- Packaging materials will be conveyed to GMI only by carriers who can assure that their vehicles (truck, tanker, rail car, ocean going vessels, etc.) are suitable for handling food packaging materials prior to loading.
- Under no circumstance, can a vehicle that has previously hauled potentially unsafe material (including, but not limited to, garbage, trash, asbestos, allergens, toxic, infectious or medical waste) be made suitable for hauling packaging materials, or be used for a shipment to GMI.
- The supplier shall perform a thorough inspection of the carriers before each loading to further assure that all potential contaminants have been removed. This includes cleaning residue or product not completely removed in cleaning and unloading hoses carried on the vehicle.
- Open-topped or canvas-topped vehicles are unacceptable for shipment of packaging materials to GMI. Allowances may vary by region with approval by QRO Packaging Manager based upon risk assessment.
    - If roll top, soft sided, or open top trucks are used, the shipper shall consult with GMI QRO Packaging Manager to minimize product safety risk.
    - Roll top or soft sides shall be in good condition without any holes.
    - In these cases, alternate methods may be employed to secure the load and visually inspect the goods for food defense.

VEHICLE CLEANLINESS AND INSPECTION

- Each vehicle must have a documented inspection prior to loading to verify the required safety and sanitation criteria are met (i.e. that the vehicle is acceptable for transportation of food products or ingredients).
- All vehicles must be free from the evidence of rodents, insects, birds, dirt, rust and scale, oil, grease, visible mold, metal, glass, rigid plastic, objectionable odors, toxic chemical residues, cleaning material residues and all other types of foreign material.
- Each vehicle must be sound, in good repair, the walls and floor free of splintering wood and have tight fitting hatches (if equipped) and doors, and be free from leaks.
- Vehicles must be washed in an approved manner as often as necessary to keep them free from buildup and foreign material contamination. Interior of vehicles must be dry prior to loading.
- The carrier is responsible for assuring wash stations use a potable water source consistent with Food Grade wash standards.

- All latches must work properly and doors must seal to exclude foreign materials and pests.
- The exterior of all vehicles shall be clean and free of excessive product, dirt and other foreign material that may contaminate products.
- On full truckload shipments all non-relevant placards must be removed from the car or truck prior to shipping (e.g. fumigation notices (exterior), or old load manifests (interior)).

VEHICLE LOADING, CLOSING AND SHIPMENTS

- In North America the Bill of Lading shall contain the following information:
    - GMI's Purchase Order Number with line number*–10 digits (e.g., 4512345601, or 45123456-01) (*The line number is the last 2 digits of the 10 digit GM Purchase Order Number)
        - This doesn't apply to all regions; contact your GMI QRO Packaging Manger if clarification is needed
    - GMI's 10-digit Material Code number
        - This doesn't apply to all regions; contact your GMI QRO Packaging Manager if clarification is needed
    - GMI's Packaging Material Name (Product Identification)
    - Product Description (for Transportation Rating Purposes)
    - Quantity Shipped and Unit of Measure
    - Scheduled Delivery Date
    - Supplier Name and Manufacturing Facility Address
    - Country of Origin, if applicable
    - Ship To Address
    - Total Net Weight/Total Shipping Weight
    - Net Weight per Unit
    - Lot Number(s) (or similar) with Number of Units in Each Lot
    - Carrier (Transportation Company)
    - Trailer Number or Car Number
    - Bill of Lading Number and/or Shipper's Number
    - The Seal Number of each seal Attached (sealing) the Trailer or Car
    - Temperature Requirements and Verification at Time of Shipment for Temperature Controlled Loads
    - Hazardous Nature of Material, if applicable
- If the packaging material is classified as a hazardous material, the supplier must adhere to all rules and regulations governing shipping/handling of such items.

VEHICLE AND PACKAGING MATERIAL SECURITY

- The trailer must arrive at the GMI facility intact and with the all doors and access points sealed as documented. The seal numbers are to be verified and recorded on the bill of lading. Missing or inaccurate seal information will be cause for rejection.
- Trailers and reefers shall be sealed by the supplier before the shipment passes from their control.
- The seal shall be a tamper evident style. The tamper evident seals' specific style and strength is the suppliers' choice.
- The seals are to be placed to reveal unauthorized access.

- Suppliers are not required to seal common carrier less than truckloads (LTL's) not shipped under their control. However, containers shipped on a non-sealed carrier must have individual unitization that is tamper evident.
- If a truck seal must be broken for any reason (e.g. border crossing, weigh station) on a sealed vessel while in transit, the carrier must note the time, date, location, and reason of removal on the bill of lading (BOL). As soon as practically possible, the container must be resealed with the new seal number, time, date, and location of the event noted on the BOL.
- The carrier must inform both the shipping location and receiving location of this change and receive their acceptance prior to continuing on to the GMI facility for unloading. Where possible, the agency breaking the seal should reseal the container with their agency specific seal. It is the suppliers' responsibility to ensure the carrier is aware that the seal can only be broken at the receiving facility by an authorized GMI employee or designate, except as noted above.

SHIPMENTS UNDER CONTROLLED TEMPERATURES

- When packaging materials are to be shipped under controlled temperature, the material and the vehicle must maintain the range specified in the GMI packaging specification at the time of loading, during transit and upon arrival at the receiving plant.
- If the packaging material must be protected from freezing or excessive heat as specified in the GMI Packaging Specifications, such protection shall be provided at the time of loading, and during transit. The communication of these requirements to the carrier is the responsibility of the packaging supplier.
- Packaging materials requiring additional heating to maintain quality and consistency must be shipped in compliance with the specification.

PALLETIZING AND LINING

- Packaging materials are to be secured within the unit load to provide integrity by stretch or film wrapping. A well-secured top cover consisting of plastic wrap, corrugated slip, or solid fiber Kraft slip-sheet is required on palletized units (bags, boxes, fiber drums) to assure maximum unit protection. Dunnage and unitization packaging requirements will be negotiated plant to plant.
- Units shall be movable by standard or multi-tined forklift trucks equipped with slip-sheet handling attachments in such a manner that the load is adequately supported and can be stacked with safety and without damage.
- If double stacking for shipping is necessary and pre-approved, units must be stacked in such a manner that they can be easily removed from the shipping vehicle by forklift truck; a slip-sheet must be on top of each such lower unit. Double-stacked product should be secured to prevent shifting and damage to the load.
- Pallets are required to have two adjacent tags readable from two sides. Pallets with multiple lots are to be indicated as such and the corresponding number of units and date of production listed on the pallet as well as on the bill of lading. No more than 2 lots can be on any one pallet.
- Packaging materials shipped in metal or plastic drums shall be unitized on wooden or plastic pallets. The drums shall be strapped together by a non-metallic strap or wrapped with heavy film for stability.
- Pallets shall be managed so they don't become the source of contamination

- Please note that these requirements (Palletizing and Lining only) may necessitate being superseded by specific receiving plant needs, which will be communicated by the receiving plant. It is the supplier's responsibility to know and comply with each plant's particular needs.

*** VEHICLE SHIPMENTS NOT MEETING THESE REQUIREMENTS MAY BE REJECTED.***

RETURN OF BULK TRAILERS (GENERAL MILLS PLANT RESPONSIBILITY)

- Any trailer that is returned to a supplier shall be resealed to prevent tampering while in transit back to the packaging material supplier.
- Trailers returned with product will have all seals that were removed at the GMI facility replaced with a unique GMI tamper evident seal (cable lock style). These seal numbers will be documented on the return paper work.
- Trailers returned empty will have all seals replaced that were removed in the process of receiving the trailer at the GMI facility. These seals will be unique tamper evident seals (plastic or flat metal is acceptable), however documentation is not required.

CONSUMER AND CUSTOMER RELATIONS

All suppliers shall have procedures in place to monitor consumer and customer complaints related to product quality, food safety and regulatory matters. This shall include both procedures to review and respond to complaints and ensure a documented review on a regular frequency to effectively respond to any trends. Additional procedures shall also be in place to ensure issues of noncompliance and Quality Notifications (QNs) from GMI are reviewed and addressed in a timely manner, not to exceed 14 days, with appropriate response and documented corrective action as well.

PRODUCT SPECIFICATIONS AND LABELING

All suppliers shall have a specification control program in place that includes clear accountabilities, document control and verification procedures to ensure the correct GMI specifications are being used. Procedures shall be in place to obtain QRO approval from GMI prior to making any changes to product, process, specifications, formulas and converting/producing locations. A process control plan shall be in place along with a sampling plan and quality attribute testing to ensure product is produced to target specifications. A label control program shall be in place to ensure product labels contain all required info and accurate information. A label verification program shall be in place to ensure right packaging material is packed in right package with the right label. Failure to comply with these requirements will be addressed through the quality notification and noncompliance process which may result in additional action by the receiving location up to and including rejection of the material. All suppliers shall notify a GMI QRO Packaging Manager and GMI plant contact if they find out material was shipped that doesn't meet our specification.

ADDITIONAL GMI SPECIFICATION REQUIREMENTS

The manufacturer of packaging materials shall supply GMI with a list of all the individual components used in the conversion of the packaging material. This information shall be kept confidential and on file in the GMI Quality and Regulatory Operations Department.

PACKAGING AND LABELING REQUIREMENTS

In North America a Packaging material labeling program shall be in place to ensure all products supplied to GMI meet the below label requirements. International packaging material labeling is coordinated with the purchasing plant.

Materials supplied to GMI shall identify the following information on the master unit on an 8 ½" x 11" label attached to two adjacent sides of the load (some GMI facilities may require labeling on all four sides of the unit) clearly legible at 15 ft.:

- GMI material code (including series number/deal code)
- The lot number, preceded by "lot"*
- Material description
- Purchase order number
- Quantity of material in appropriate units
- Vendor name
- Vendor producing location
- Date of manufacture, preceded by "MFG" or another clearly distinguishable label for manufacture date
- The GMI name of the material
- Sequential pallet number

*The term "batch"(or similar) may be used in the place of "lot" if clearly identified and easily discernible on each unit and supporting documentation.

When the units are palletized, they shall be positioned so the GMI material code, lot number and date of manufacture are readable from at least two adjacent sides (four sides preferred).

Closure: No metal clips shall be used for closing the units nor shall metal or plastic ties be used for closing bags within the unit.

Bags/Liners: Package liners must be manufactured according to "food grade" specifications. Poly liners must conform to the food additive order in 21 CFR 177.1520 or, certified as food grade.

STORAGE REQUIREMENTS

Storage times are used on all GMI packaging materials in order to protect product quality and maximize both supplier and GMI's productivity. These times are based on the recommended storage life provided by the supplier from the date of manufacture under specific storage conditions and packaging. Alternate storage conditions can change the storage life and are reflected in our specification when appropriate. All suppliers shall have an inventory management program in place to ensure age management and compliance to first in first out (FIFO) or first expired first out (FEFO) accounting principles.

Recommended storage times and conditions are required by the supplier, as part of the technical information included in the specification, for all packaging materials due to their importance in accurate management of packaging materials to assure quality. Accurate testing and supporting documentation to determine packaging materials storage times and conditions are the responsibility of the supplier.

ANALYSIS AND INSPECTION

This section covers Certificate of Analysis which can also be called a Certificate of Inspection. This is not required in all regions. Product shall not be shipped to GMI until the supplier has completed all required testing and is satisfied that the material meets both the supplier's internal requirements as well as GMI's requirements. If product is to be shipped for clear in transit, GMI shall be notified in advance with documented GMI approval by the receiving plant QRO Manager and Business Unit Leader prior to shipment when applicable.

If required, the items to be tested and documented on the COA are listed in the GMI Specification under the Certificate of Analysis section. EXCEPTIONS to these requirements must be approved by GMI. Each COA shall identify the supplier, the producing location, the material by GMI material name and number, the results by lot number, date of shipment, and PO #. The country of origin shall also be included on the COA where applicable for regulatory and country of origin labeling (COOL) purposes.

All COA's must arrive with or be at the receiving plant's attention prior to receiving the material in question. All COA results must be available on a timely basis upon request from GMI.

COMMUNICATION OF CHANGES

All facilities shall have a program that assures appropriate and timely communication of changes to GMI with approval granted prior to implementation.

Examples of changes requiring communication:

- Facility Critical Control Point (CCP) change, where applicable
- New allergens introduced to previously approved producing lines for GMI

- New producing line or location
- Company name change
- Raw material supplier change
- Pack size change (including pallet quantity changes)
- Any deviations from packaging material specifications or drawings
- If the facility starts to conduct micro testing at the request of a different customer the test plan should be communicated to General Mills

FOOD SAFETY PLAN

It's required that food-contact packaging suppliers have an audited HACCP (Hazard Analysis of Critical Control Points) program in place. It's recommended that all other packaging suppliers have a HACCP or similar Food Safety Plan. For this section "Food Safety Plan" includes HACCP or similar programs. Each supplier location shall have a Food Safety Plan based upon the 7 commonly accepted principles of HACCP for each producing line and product type including:

1) Documented hazard analysis detailing chemical, physical and biological hazards
2) Identification of CCPs (Critical Control Points)
3) Established critical limits for CCPs
4) Monitoring procedures for CCPs
5) Defined corrective action procedures when Critical Limits are not met
6) Ongoing verification procedures that demonstrate HACCP is working
7) Established record-keeping and documentation procedures

The Food Safety Plan shall be supported by a multi disciplinary Food Safety Team that meets on a regular basis, with minimum annual review and prior to any significant changes. The Food Safety Plan shall describe the product, distribution and intended use. A flow diagram shall be developed to describe the process. The Food Safety Plan shall be validated initially and prior to any signficant changes.

The Food Safety Plan shall include identification of hazards from product design to production and through consumption with detailed raw material and process hazard analyses. Significant hazards likely to cause illness or injury in the absence of control shall be designated as Critical Control Points (CCPs). Defined critical limits shall be established. The plan shall include monitoring procedures with detailed steps, frequency, person performing the check and documentation as well as verification procedures to ensure the Food Safety Plan is being followed. A documented corrective action shall be in place to address deviation or loss of control at the CCPs. This shall include root cause analysis, product risk assessment and disposition, and actions taken to regain control. Food Safety Plan records shall be stored securely, easily retreivable and retained for the shelf life of product.

If our audit procedure finds undue risk we may require a Food Safety Plan and/or sufficient mitigating corrective actions.

Examples of packaging hazards include but, aren't limited to:

- Physical hazards that could include an inadequate GMP progroam or employees not following the documented GMP program
- Chemical hazards that could include mixed copy (labels including allergens mixed with labels without allergens)
- Microbiological hazards that could include blind swabbing for pathogens

FOOD ALLERGENS

All suppliers to GMI shall develop and maintain an Allergen Management Program that effectively controls the risks associated with these allergenic ingredients: **peanuts, tree nuts, milk, eggs, soy, wheat, fish, crustaceans, mollusks, mustard, sunflower seeds, sesame,** and **cereals containing gluten.** Additional allergens or sensitizing agents may require control as regulated in the country of manufacture and country of sale.

A packaging producing location can become contaminated with allergens through numerous circumstances. A few examples are: receipt of raw materials on trailers that previously transported material to a plant that uses allergenic ingredients or through returned dunnage that has been used in areas with allergenic ingredients.

Printed packaging suppliers: Packaging suppliers must be aware of the allergenic ingredients listed on the various labeling they may run. They must be aware of the packaging materials that are labeled with allergenic ingredients to effectively control them and ensure they aren't mixed with materials that don't label for allergenic ingredients.

Packaging suppliers must evaluate their inks, oil and/or processing aids for allergens through a supplier approval program. If any allergens are identified these shall be managed through an allergen management program. Allergens in these products will require the packaging supplier to implement an appropriate control program.

GMI Base Material Number/Art copy within a shipping unit or pallet must be the same. Mixing of different GMI base material numbers/art copies (also known as gang runs or combination runs) must be approved by GMI QRO Packaging Manager. For regions outside the US approval must come from your GMI designated contact.

The below section describes allergen control practices for lines and facilities with a combination of various allergenic and/or non-allergenic products.

SEGREGATION AND LINE CLEARANCE

Storage practices shall be in place to prevent mixing of allergenic labeled packaging material, etc. All suppliers shall have a line clearance program in place and regularly verify its effectiveness.

Line Clearance/Pre Start Up Review (LC/PSUR) programs are implemented to minimize and/or eliminate the risk of mixed copy. An acceptable LC/PSUR Program must have a documented procedure aligning to GMI corporate policies. It also has production order based documentation that should require multiple signoffs (employee performing the activity and then a reviewer). For film and flexible laminates a sample of the "transition material" is often saved as evidence that all mixing occasions at product change splices have been taken out of the product flow/stream.

REWORK

Plant rework policies shall be established, followed and documented. Rework must be "Same into Same" only and should be used during the same production run or as early as possible during subsequent production run.

ALLERGEN LABELING

Suppliers shall label all allergens and have a system in place to verify the accuracy of labels. Verification steps to document the accuracy of all labels must be included. Where possible the use of bar code reading equipment should be utilized for verification purposes.

Controls and measures should be in place to prevent mixed labeling.

TRAINING

A documented allergen training program shall be in place to educate all employees (employees, temps, support staff, management, etc.) on the basics of the major allergens and their risks. Training shall be conducted at least annually.

PROGRAM VALIDATION

The overall allergen management program shall be validated and reviewed for effectiveness on an annual basis.

CONTROL OF BIOLOGICAL HAZARDS

Packaging materials supplied to GMI shall conform to all regulatory agencies' microbiological requirements, and be safe and suitable for food contact use (if intended) in accordance with Good Manufacturing Practices. Microbiological test results shall be provided to GMI upon request for review. A hold and release program is required if you are conducting any pathogen testing on packaging materials or in zone 1 (product contact areas.)

PROCESSING CONTROLS

All processes shall be in compliance with applicable government regulations and products produced in such a manner to ensure food safety. Additional controls shall be evaluated to minimize the risk of cross contamination for microbiologically sensitive areas:

- Effective hand washing
- Effective footwear controls
- Tool control
- Evaluation and control of traffic (personnel, materials)
- Segregation of raw and post processed areas
- Positive air flow from microbiologically sensitive areas
- Additional controls for construction and unique plant activities

FINISHED PACKAGING MATERIAL TESTING

This is not required for packaging material suppliers however if a packaging supplier completes finished product testing the following shall be managed. The biological control plan shall include procedures in place for finished product testing with designated sampling location(s), sample size, and frequency of testing to be conducted for each product. A process shall be in place to effectively respond to microbiological results exceeding critical limits including investigation, corrective action, product disposition and customer notification as needed. Tests to be conducted shall be documented and performed using standard approved test methods by trained personnel. A positive release program shall be in place to ensure no product is shipped until product has cleared microbiological testing. If product is to be shipped for clear in transit, GMI shall be notified in advance with documented GMI approval by the receiving plant QRO Manager and Business Unit Leader prior to shipment when applicable. No product or lots confirmed to be positive for pathogens shall be released. Any product not meeting micro-biological acceptance criteria shall have a risk assessment performed. Product or lots testing positive for pathogens may be retested for investigational purposes only.

ENVIRONMENTAL MONITORING

If a supplier chooses to have an environmental monitoring program it should be designed to reduce risk of post process contamination. Industry experience has shown that an ongoing monitoring and control program focused on pathogens of concern as part of the site food safety plan reduces the possibility of contaminations in finished products. The environmental monitoring program shall have the capability to identify harborage niches, detect and identify microbiological contamination. The supplier shall have a process to respond to positive results including root cause analysis, swabbing, cleaning and sanitizing and ongoing monitoring at an increased frequency until 3 consecutive negative results are achieved. Corrective and

preventive action shall be taken to remediate positive findings. Positives for composite samples shall be followed by reswabbing of individual sites. This is not required for packaging material suppliers but, is recommended if there is reason for concern or if this is a requirement from another customer.

For facilities choosing to conduct zone 1 (product contact areas) testing for pathogens, additional controls shall be put in place with consideration for validated cleaning procedures, clean breaks, supporting documentation, hold and release program and a process to respond to positive test results. A positive pathogen result on zone 1 surfaces may implicate the finished product produced on that line during the time the positive was found and between clean breaks. If testing finished product and the results are negative it does not negate the zone 1 finding and the zone 1 finding must still be addressed.

GOOD LABORATORY PRACTICES

If testing is being conducted it must be at an accredited laboratory with proper Good Laboratory Practices (GLPs) in place for food microbiological labs to validate and verify the accuracy of the results. The laboratory shall be limited to routine microbiological analysis of food products and environmental samples. It is strongly recommended that pathogen confirmations be done by an accredited outside lab. The laboratory shall be kept clean, and equipment kept in good repair, with calibrations performed routinely, as needed. Procedures shall be in place to ensure the containment of microbiological hazards and eliminate the potential for cross-contamination to other areas of the facility (i.e. production floor). Access to the lab shall be limited to authorized personnel only. The laboratory must not open directly onto the production floor and must contain an autoclave, or other sterilization method for all hazardous waste.

Documented Standard Operating Procedures (SOPs) shall be in place for sample preparations, testing methods, and sample disposal. Quality control standards should also be established to verify the accuracy of results, and include duplicate sample analysis, use of positive and negative controls, and routine proficiency testing for all lab technicians. All methods used for analysis shall be validated and appropriate for their application, as defined by the laboratory vendor.

RAW MATERIALS

All facilities shall have a risk based supplier quality assurance program that ensures the quality and safety of all raw materials along with conformance to approved specifications and all applicable government regulations.

Typical Program Requirements Include:

- New Vendors - Risk based approval process
- Current Vendors – Ongoing maintenance process
- Written specifications for all raw materials
- Continuing guarantees, or an equivalent on file
- Approved supplier list
- Procedures to handle emergency situations when a raw material must be purchased from a non-approved supplier
- Non-compliance management
- Raw material receiving procedures
- Traceability programs

CONTROL OF PHYSICAL HAZARDS AND FOREIGN MATERIAL

Suppliers may have a physical hazard detection and control program including strategic placement of strainers, sifters, scalpers, filters, magnets, X-rays, visual sorters, and/or metal detectors at strategic points in the process from point of unloading throughout the process. Physical hazard detection and control devices shall not be used to clean up known contamination in the raw materials or finished product. Terminal product protection devices shall be present as appropriate to the material category and product type. This could include sifter, magnet and metal detector, ideally in that order. There shall be no further processing or handling between these final product protection devices and the end of the production line.

All physical hazard detection and control devices shall have an effective management program including:

- Immediate response to findings
- Investigation into source and root cause
- Risk assessment for product produced
- Complete documentation of checks and findings
- Retention of foreign matter through shelf life of product

Product rejected from physical hazard detection and control devices during normal operation shall not be reintroduced into the process for acceptance and/or shipment. Product may be repassed for investigational purposes only and cannot be released. Refer to the material category appendices for material specific control of physical hazards and foreign material requirements.

GLASS, BRITTLE PLASTIC AND CERAMICS CONTROL PROGRAM

It is required that the facility has a documented glass, brittle plastic and ceramic control program including:

- Full inventory and audit of glass, brittle plastics and ceramics on a risk based frequency
- Procedure for handling breakage including segregation, product evaluation, clean up, documentation, corrective action, etc.

FOOD DEFENSE

All facilities shall have measures in place to reduce the chance of someone intentionally contaminating the packaging material. At a minimum, GMI requires all vendors to conduct an annual self-assessment of their food security including a documented plan for corrective action.

Typical Program Requirements may include:

- Food Defense Team
- Analysis of the food defense risks internal and external
- Formal, documented Food Defense and Crisis Management Plan
- Customer communication
- Access points and materials effectively controlled (includes cleaning chemicals)
- Routine audits of all access points
- Identification system for employees, visitors and contractors
- Annual and new hire training

PACKAGING MATERIAL FOOD SAFETY

RESIDUAL SOLVENTS/ANALYTICAL TESTING

Food Contact Packaging materials supplied to GMI shall impart no foreign odor, flavor, or hazardous compounds to food products. Please contact your QRO Packaging Manager for alignment on limits of volatiles generally associated with printing and laminating. This test requirement applies to all food contact (except metal and glass) and some indirect contact packaging materials as determined by GMI.

ODOR/SENSORY TESTING

The food contact packaging materials shall not impart foreign flavor or odor to the products. Packaging materials are evaluated based on GMI internal test method "Jar Odor Test" in combination with actual and/or accelerated shelf life sensory testing. Please contact your QRO Packaging Manager if you have questions regarding this testing. This test requirement applies to all food contact (except metal and glass) and some indirect food contact packaging materials as determined by GMI.

GUARANTY

For all regions a food grade certificate is required. In the US before any direct food contact materials may be used, a signed GMI Packaging Material Guaranty Letter must be on file with the GMI Quality and Regulatory Operations (QRO) Department. The form requires CFR 21 reference and food class and condition of use designation for the packaging material. See an example of a blank template in Appendix K.

GENERAL SPECIFICATION REQUIREMENTS

MATERIAL SPECIFICATIONS

Suppliers must comply with and fully understand GMI material specifications. The requirements found in this general specification shall apply to each individual material specification. Where details differ between the general and individual specification, the individual specification shall take precedence. When applicable, a drawing along with its revision number and date is referenced for each application of an individual specification. The drawing provides details on basic size, style, cutting, printing, scoring, varnishing, etc. Specifications may not be modified or superseded orally. Modifications or waivers are allowed only if in writing from GMI Packaging Quality and Regulatory Operations, except in GMI International (modifications or waivers aren't allowed.) Suppliers shouldn't produce materials until they've received these three components as specifications and drawings are subject to change until released to the supplier. If the supplier wants to request changes to the specification or drawing they must contact the appropriate GMI QRO Packaging Manager and provide redlines.

TOXIC HEAVY METALS

Materials supplied to GMI shall not be manufactured with the use of lead, cadmium, arsenic, mercury, selenium, antimony or chromium. This includes components of the material itself as well as any inks used to print the material.

ALTERNATE RAW MATERIAL PROCEDURE

Vendors are to use the following procedure when changing raw materials to new components:

- Before any change to raw materials you must contact your GMI QRO Packaging Manager, GMI designated contact, or Sourcing contact.
- Compare critical attribute values between what is currently being used and the proposed structure. The summary of data should include sample size, average, standard deviation, and a note as to whether the values are based on individual values or averages. Email this information to your GMI QRO Packaging Manager
- Upon satisfactory review of the summary data, the appropriate GMI QRO Packaging Manager will authorize production of one order of material using the alternate component(s).
- From that production run, complete critical attribute testing on randomly selected samples of finished material and provide the results to GMI QRO Packaging Manager summarizing by sample size, average, and minimum and maximum values seen.
- Upon satisfactory review of that data, GMI will provide a revised specification that will authorize the proposed change to take place on a permanent basis.

PRINTING REQUIREMENTS

- The print requirements listed below are requirements for suppliers that ship products to North America only. Other regions in the world will have varying requirements.
- Sample Requirements:
    - 25 Samples representing at least one of each position of every new design are to be shipped to GMI Packaging Library—samples shipped within 1 week of printing.

        - 2 Samples from every repeat press run are to be shipped to GMI Packaging Library on a timely basis.
- Sample requirements for other regions will vary
- Printing Requirements:
    - Visual Match - Printed results must visually match signed and GMI approved Color Target for content and color.
    - Measurement of Color -

        Instrument: recommended is DE2000, D50/2°
        Ink Drawdowns: 2.0 or better DE
        Print Run: No greater than 4.0 DE
    - Registration – Maximum print to cut registration deviation can be no greater than 1/16". Color to color registration: no 2 colors can be more than 1/64" out of register.
    - Dot Area – Dot Gain and Density must be within +/- 10% of Suppliers Published Dot Gain and Density Target for CMYK inks
    - Materials must be free of scumming or defects that alters the color or interferes with the legibility of the text and/or scanning of the barcode.
    - FTA FIRST guidelines to be followed for all flexographic printed packaging. Or regional equivalent standards.
    - Gracol 2006 specification for G7 to be used for all offset printed packaging. Or regional equivalent standards.
    - Graphic Changes must be managed through GMI Brand Design. Files cannot be altered without GMI Brand Design approval.
    - Bar Codes: QR Codes, 2D Codes, UPC, ITF-14 – Printer is responsible for ensuring that bar codes are scannable at rate at GMI manufacturing facilities, co-packers, and customers.
    - All additives or processing aids must be free of allergens (i.e. offset spray containing wheat starch derivatives is prohibited due to allergen concerns)
        - Corn starch is prohibited if used in a yogurt application
    - **GMI Base Material Number/Art copy within a shipping unit or pallet must be the same.** Mixing of different GMI base material numbers/art copies (also known as gang runs or combination runs) must be approved by GMI QRO Packaging Manager. For regions outside the US approval must come from your GMI designated contact.
- Steps to verify compliance:
    - Brand Design team will review incoming samples, visually comparing to Color Target. Samples will be graded on a rating scale of : On Target, Below Target, Significantly Below Target
    - Excessive deviation from spec identified through Print Quality Review may require audit.
    - If warranted, there will be an establishment of a Performance Improvement Plan – which may include 3rd Party Auditing for Print Quality Program (PQP) at supplier's expense
    - Scorecard must maintain passing score for agreed period of time

TRAINING AND QUALITY MANAGEMENT SYSTEMS

All facilities shall have procedures in place to ensure all food safety and quality management systems are fully documented with clearly defined accountabilities. Change management procedures shall be in place to ensure review and communication of any and all changes. These shall also be accompanied by a record management program to ensure proper retention and storage of all related documentation. Records shall be easily accessible and stored in a manner to protect against loss or damage.

A documented training program shall be in place to ensure effective onboarding and ongoing awareness for quality and food safety programs. This should include an annual refresher for all employees and cover key topics such as food safety, HACCP, allergens, GMPs, food defense, regulatory compliance and other job specific topics where applicable.

COMMUNICATION OF SUPPLIER PROCESS CHANGES

GMI has attempted to identify all critical material attributes and reference/quantify these in the material specification, general specification, or applicable drawings/diagrams. We recognize, however, that certain changes in the manufacturing process and/or raw materials can alter the functional or performance characteristics of the material, and yet fall within established specification parameters. For this reason, we request that packaging vendors communicate process and raw material changes which might potentially impact performance specifications. This information should be directed to the appropriate GMI QRO Packaging Manager.

NON-CONFORMING MATERIALS

Materials which do not meet specifications within the required established tolerances and workmanship generalities (as noted in each material specification and Appendices B-J) are subject to rejection. The filing, verification, and disposition of non-conformance issues will be handled through the GMI Supplier Performance Quality Notification (QN) system. It is not GMI policy to reject on the basis of audit samples; rather, aesthetic and/or functional problems must be demonstrated by the receiving plant before complaints (Quality Notifications or QNs) are issued. Other GMI plant expenses incurred due to materials that don't meet specification are subject to negotiation.

PROCESS CAPABILITY STUDIES

Vendors are expected to have adequate control programs to ensure conformance to GMI specifications. It is essential that critical control points for the manufacturing process are identified to ensure conformance. Capability studies on those control points must be conducted to statistically determine the ability to consistently produce materials within the limits of GMI requirements. The results of those capability studies shall be supplied upon request and shall be made available during periodic audits.

OUTTURN SAMPLES

GMI may randomly monitor production samples; however, the accountability for conformance rests with the vendor. Samples are to be provided to GMI upon special request only.

LABORATORY ANALYSIS REPORTS

A statistical summary of requirements outlined in GMI specifications is to be collected on each production lot. Upon request, this information shall be provided to the appropriate GMI QRO Packaging Manager.

*All appendices apply only to suppliers that ship products to North America. Other regions in the world shall use this as a guideline based on experiences. Outside North America, refer to the individual packaging specification for material specific requirements.

APPENDIX A: CONTACTS AND REFERENCES

CONTACTS FOR GMI NORTH AMERICA SUPPLIERS

- Contact your GMI QRO Packaging Manager or if their contact information is unavailable reference the GMI specification cover letter for contact information

REFERENCES

GMI Global Audit Program (G-GAP):

- http://ggap.force.com

Allergens:

- Food Allergy Research and Resource Program
- FDA Food Allergens
- FDA Food Allergen Labeling
- Food Allergy and Anaphylaxis Network

Environmental Monitoring Program:

- ICMSF Book 7, Chapter 11: Sampling to Assess Control of the Environment
- GMA Salmonella Control Guidance

Food Defense:

- FDA Food Defense Awareness Training for Employees
- FDA Food Defense Training Information
- USDA FSIS Food Defense and Emergency Response
- AIB Online Training

HACCP:

- FDA HACCP Principles Application Guidelines

Water Testing Standards:

- WHO Drinking Water Guidelines
- EPA Drinking Water Standards

APPENDIX B: FILM AND FLEXIBLE LAMINATES

WORKMANSHIP

All flexible packaging materials supplied to GMI shall conform to the accepted workmanship practices outlined below. While quantifiable parameters are not established, material not considered acceptable for these characteristics is subject to rejection.

- No baggy film
- No gauge bands
- No delamination
- No wrinkles
- Roll edge weave – maximum = 0.125 inches (3.175 mm)
- Roll skew/10 ft. length – maximum = 0.25 inches (6.35 mm)
- Curl that impacts runnability
- Maximum allowable gel size = 0.02 inches (0.508 mm)
- No external contamination including, but not limited to, dirt, grease, dust, hair, etc.
- No crushed cores, wrong-sized cores, or loose winds
- Roll side-to-side variation – maximum = 0.1563 inches (3.97 mm)
- No static to the extent that the material is not runnable
- No blocking to the extent that the material is not runnable

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

Note 2: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

NOTE 3: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

ROLL SPLICING

Flexible packaging materials supplied in roll form shall contain no more than three (3) splices per roll with a maximum allowable average of one (1) splice per roll per pallet on individual pallets. Refer to material application specific specification for details on splice type, color, etc.

APPENDIX C: PAPERBOARD

WORKMANSHIP

Paperboard packaging materials (hereinafter referred to as "cartons") shall be defect-free. The following are considered defects:

- Clay-peel (board stock shall have good adhesion of the clay-coating to the board fiber)
- Glue-peel (specific to board quality from the mill; must readily accept adhesive – whether cold-glue or hot-melt; Reference: GMI Test Method H13 – WALDORF)
- Contamination with objectionable odors (even if material has passed RSOL testing)
- Contamination with dirt, grease, or other foreign material (board stock shall have a clean appearance – both sides)
- Contamination with embedded metal (cartons shall be able to pass through GMI metal detectors when calibrated with a 3/32" (2.381 mm) series 400 stainless steel sphere)
- Delamination – including blisters (Reference: TAPPI T541 – ZDT test)
- Checking (board stock shall not have a wrinkled or creped appearance on the print side from excessive de-curling)
- Die-cutting / scoring defects including the following:
    - Webbed flaps
    - Cracked or cut scores (not to be confused with perf-scores)
    - Missing cuts and/or scores
    - Punctures
    - Improper (misplaced) cuts
    - Easy-open features and/or perf-scores too shallow or too deep (these various features must adhere to the cut depth specified on the respective Drawings attached to the Vendor Specification)
- Insufficient or excessive offset spray powder (specific to sheet-fed converting)
- Excessive edge-dust (specific to conventional steel-rule flat-bed die-cutting) or edge-slivers (specific to rotary pressure-cutting)
- Unglued or poorly glued side-seam (specific to pre-glued cartons; adhesive shall have good bond to both side of the board stock)
- Cartons that are glued together and/or glued shut (specific to pre-glued cartons)
- Scrap within the load (usually specific to flat cartons; yet also known to be present with pre-glued cartons)
- Insufficient or excessive fluff (specific to pre-glued cartons); see NOTE 1 (below).
- Mixed loads of cartons (different art copy graphics shall not be placed on the same pallet)
- Bowing in its various forms including the following; see NOTE 2 (below).
    - Warp (moisture-related bowing in the cross-direction) of more than 0.25" (6.35 mm) per 12" (304.8 mm)
    - Curl (de-curl-related bowing in the machine-direction) of more than 0.25" (6.35 mm) per 12" (304.8 mm)
    - Deformation (odd or irregular bowing in any area of the carton due to scrap in the load, carton damage, banding damage, etc.) of more than 0.25" (6.35 mm) per 12" (304.8 mm)
    - Twist-warp / torsion-warp (bowing at roughly 45-degrees across both the machine-direction and the cross-direction; sometimes resulting from uneven moisture across the web, and sometimes resulting from mechanical issues creating uneven web tension)

- Palletizing damage

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

NOTE 3: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

NOTE 4: Pre-glued cartons shall meet industry-standard guidance for edge-caliper (or "fluff") at 3x board caliper with a range of +/-5 points for board stock up to 18-point. Board stock at 20-point and above may need the edge-caliper to measure 4x board caliper +/-5 points. However, certain receiving plants (whether GMI or contact locations) may need slight adjustments to accommodate particular lines or machines. (Case dimensions also need to be appropriate to avoid insufficient "slack" – which can create "flat" cartons – and excessive "slack" – which can create carton damage or deformation – leading to machinability issues.

NOTE 5: It is the desire of GMI to receive cartons that remain flat within 0.25" (6.35 mm) per 12" (304.8 mm) over the temperature and humidity range of 60-80 degrees Fahrenheit and 35-60% Relative Humidity (Reference: GMI Test Method WARP01. Until vendor capability is demonstrated to meet bowing less than 0.25" (6.35 mm) per 12" (304.8 mm), GMI will employ the following procedure:

- When bowing is 0.25–0.50" (6.35-12.7 mm) per 12" (304.8 mm) – within the specified temperature and humidity range – then a negotiated settlement of the claim against the vendor is expected.
- If bowing is greater than 0.50" (12.7 mm) per 12" (304.8 mm) – within the specified temperature and humidity range – the cartons are out-of-specification and the complaint must be honored.

NOTE 6: Cartons shipped to our receiving plants must be less than 120 days old from the date of manufacture (converting) – unless GMI gives express permission (R&D, Sourcing, QRO and/or receiving plant). An example of express permission is "bill & hold" items.

SECONDARY PACKAGING REQUIREMENTS

Cartons shall be packaged securely to adequately withstand the rigors of the distribution environment from your producing locations to our receiving locations (GMI plants and/or contract locations). The following are considered requirements; however, each receiving location has express permission to negotiate specific accommodations with your producing locations as needed, and we also hereby acknowledge that not every producing location will have the requisite equipment to meet each and every requirement, whereupon exceptions may be granted:

- Flat-packed cartons shall sit atop a corrugated slip-sheet with a pull-tab for appropriate handling with a push-pull truck.

- It's recommended that loads of flat-packed cartons be protected with a compression-shrink bagging system (not stretch-wrapped) and will incorporate a vapor barrier between the cartons and the slip-sheet.
- Pre-glued cartons shall be packed in appropriately-sized corrugated cases and stacked on standard heat-treated white-wood pallets.
- Loads of pre-glued cartons shall be protected with conventional stretch-wrap and secured to the wood pallet with poly (not metal) banding in both pallet directions or multi-directional stretch wrap.
- Trailers shall be clean and in good condition, and shall not introduce physical, chemical or biological contaminants to the cartons and/or the receiving plants.

APPENDIX D: PAPER

WORKMANSHIP

All paper packaging materials supplied to GMI shall conform to the accepted workmanship practices outlined below. While quantifiable parameters are not established, material not considered acceptable for these characteristics is subject to rejection. Examples of common quality requirements are shown below.

- No wrinkles
- Roll hardness range – minimum = 0 inches, maximum = 12.0 inches (304.8 mm)
- Roll edge weave – maximum = 0.125 inches (3.175 mm)
- Roll skew/10 ft. length – maximum = 0.25 inches (6.35 mm)
- Roll outside diameter side-to-side variation – maximum = 0.1563 inches (3.97 mm)
- Curl - maximum = 0.5 inches (12.7 mm)
- No external contamination including, but not limited to, dirt, grease, dust, hair, etc.
- No crushed cores, wrong-sized cores, or loose winds
- No static to the extent that the material is not runnable
- No blocking to the extent that the material is not runnable

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

NOTE 3: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

ROLL SPLICING

Paper packaging materials supplied in roll form shall contain no more than three (3) splices per roll with a maximum allowable average of one (1) splice per roll per pallet on individual pallets.

APPENDIX E: GLASS

WORKMANSHIP

All glass packaging materials supplied to GMI shall have no critical, major and or any excessive minor defects. While quantifiable parameters are not established, material not considered acceptable for these characteristics is subject to rejection.

Defects are classified as:

- Critical are those that are hazardous to the user and those that make the container completely unusable.
- Major are those that materially reduce the usability of the container or its contents
- Minor are those that do not affect the usability of the container, but detract from its appearance or acceptability to the customer.

Critical Defects in Glass Bottles or Containers can include the following:

- Stuck Plug. A piece of glass, usually very sharp, projecting inwards just inside the neck bore
- Overpress. Is a defect where a small ridge of glass has been formed on the sealing surface of the finish
- Split. An open crack starting at the top of the finish and extending downward.
- Check. A small, shallow surface crack, usually at the bore of the container
- Freaks. Odd shapes and conditions that render the container completely unusable. Bent or cocked necks are a common defect of this type.
- Poor Distribution. Thin shoulder, slug neck, choke neck, heavy bottom are terms used to describe the uneven distribution of glass.
- Soft Blister. A thin blister, usually found on or near the sealing surface. It can however show up anywhere on the glass container.
- Choked Bore. Here excess of glass has been distributed to the inside of the finish or opening
- Cracks. Partial fractures, usually found in the heel area.
- Pinhole. Any opening causing leakage. It occurs most often in bottles with pointed corners.
- Filament. A hair-like string inside the bottle.
- Spike. Spikes are glass projections inside the bottle.
- Bird Swing. Is a glass thread joining the two walls of the container

Some Major Defects Commonly Found in Glass Containers

- Chipped Finish. Pieces broken out of the top edge in the manufacturing process.
- Stone. Small inclusion of any non-glass material
- Rocker Bottom. A sunken center portion on in base of the container
- Flanged Bottom. A rim of glass around the bottom at the parting line

Some Minor Defects Commonly Found in Glass Containers

- Sunken Shoulder. Not fully blown, or sagged after blowing
- Tear. Similar to a check, but opened up. A tear will not break when tapped, a check will.
- Washboard. A wavy condition of horizontal lines in the body of the bottle.
- Hard Blister. A deeply embedded blister that is not easily broken.
- Dirt. Scaly or granular non-glass material.
- Heel Tap. A manufacturing defect where excess glass has been distributed into the heel

- Mark. A brush mark is composed of fine vertical laps, e.g. oil marks from molds.
- Wavy bottle. A wavy surface on the inside of the bottle.
- Seeds. Small bubbles in the glass
- Neck ring seam. A bulge at the parting line between the neck and the body.
- The glass cannot change the integrity of the original color of the product.

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

SPECIFICATIONS

Finish Tolerances vary for any given characteristic depending on size and container design. These standards are documented on the Glass Packaging Institute Finish Specification.

APPENDIX F: CORRUGATED

WORKMANSHIP

- Dimensional tolerances
  - All panels +/- 1/16" (1.5875 mm) except the panel the tab is glued to. That panel may be cut back a maximum of 1/8" (3.175 mm) only if necessary to meet GMI joint gap specification.
  - Manufacturers glue joint tab: 1 3/8" (34.925 mm) minimum (unless otherwise specified).
  - Overall sheet size/blank +/- 1/8" (3.175 mm)
- Slot dimensions
  - Depth: + 3/16" (4.7625 mm) overslotted, - 1/8" (3.175 mm) underslotted (from center of inside flap score.)
  - Width: 3/8" (9.525 mm) unless otherwise specified
  - Centering: +/- 1/16" (1.5875 mm) form alignment with center of body score (unless otherwise specified).
- Manufacturers joint*
  - Single wall: 1/4" – 1/2" (6.35 – 12. 7 mm) gap, 3/8" (9.525 mm) target
  - Double wall: 3/8" – 5/8" gap (9.525 – 15.875 mm), 1/2" (12.7 mm) target
  - Total skew: 1/8" (3.175 mm) maximum as measured at the intersection of the slot and the horizontal score, 3/32" (2.381 mm) for E&F flute only

  *As measured at the intersection of the slot and the horizontal score.
- Blank warp/curl: 1/4" (6.35 mm) per foot maximum (Reference: GMI method WARP02).
- Scoring: unless specified otherwise in the individual specification, all scores are to conform to the following:
  - Body scores: point to flat
  - Flap scores: point to point, offset 1/8" (3.175 mm) +/- 1/32" (0.794 mm) measured center to center or hinge type.
  - Must be sufficiently deep to give 180 degree fold without cracking of outer or inner facings. (90 degrees left and 90 degrees right from unfolded orientation.)
- Glueability: must affect a fiber tearing bond under normal production conditions.
- Air resistance (Gurley): 8 second minimum (Reference: GMI method A-44).
- Corrugated packaging materials shall be made in accordance to the packaging specifications and be defect-free. Defects include but are not exclusive to:
  - Contamination including but not exclusive to:
    - Objectionable odors
    - Dirt, grease, water, glass, or other foreign material
    - Embedded metal
    - Organisms such as mold, insects and rodents
  - Delamination
  - Die-cutting/scoring defects including but not exclusive to:
    - Cracked scores
    - Missing scores/cuts
    - False scores/cuts
    - Misaligned scores/cuts
    - Perforation scores too shallow or too deep
    - Score depth too shallow or too deep
    - Slot depth too shallow or too deep
    - Poor die cut registration

- Unglued or poorly glued manufacturers joint (when pre-glued is specified)
- Excess glue (corrugated glued together/glued shut)
- Too narrow, too wide, or skewed manufacturers joint
- Scrap within the corrugated or load
- Mixed or mislabeled loads of corrugated
- Excessive warp/curl
- Palletizing damage or issues such as too tight or too loose banding, damaged pallets, etc.

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Cases shipped to our receiving plants must be less than 90 days old from the date of manufacture (converting) – unless GMI gives express permission (R&D, Sourcing, QRO and/or receiving plant).

NOTE 3: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

PRINTING REQUIREMENTS

- Printing copy must agree with GMI specifications and the location of critical elements, i.e., scan codes must be accurate to +/- 1/16" (1.5875 mm).
- Uniform ink coverage is required with no obvious show through the board.
- Edges of printing must be sharp and clean, and the corrugated shall be free of print defects. Print defects include but are not exclusive to: print voids, poor print registration, print fill, color variation/mismatch, and washboard.
- UPC scan code requirements are referred to in the Application Standard For Shipping Container Codes - issued by the Uniform Code Council, Inc., June 19, 1996
- ANSI Symbol Grade code requirements for UPC Code 128 and ITF-14 print quality shall not be less than ANSI grade "C" (Reference: General Mills, Inc. Print Quality Guidelines ITF-14 Bar Code Symbols on Corrugated)
- Additional printing requirements and defects are specified in the General Specification Requirements section of this manual.

CONTAINER COMPRESSION REQUIREMENTS

If listed, compression requirements are the single most important performance requirement in the material specification. If additional criteria such as ECT or Board Combination listed in the specification conflicts with the vendor's ability to meet the compression requirement, the vendor must contact GMI QRO Packaging Manager immediately to arrange for a specification update.

APPENDIX G: COMPOSITE CANS

WORKMANSHIP

- Liner Standards
  - Foil Surface Finish: Smooth matte
  - Foil Orientation: Matte side out
  - Pinholes (Maximum): None through laminate, 150 pinholes/sq. ft., Foil (light box)
- Body Stock Standards
  - Wet Strength: Wet strength in all plies except top and bottom
  - A minimum of one Julian code must be present and legible per can.
- Label Standards
  - Material Configuration: Printed side out with direction of unwind as specified on art copy.
  - Straight Edge Test - 90.096: Excessive bubbles subject to rejection.
  - Bar Code: Bar code must scan correctly.
  - Wet Ink Adhesion - Test Method 90.093: None
  - Dry Lamination - No delamination
- Splices
  - Butt type taped both sides with 1" wide tape of contrasting color.
  - Splices must not break in normal winding operation.
  - Splicing tape shall not exceed slit width of label.
- Metal End Standards
  - Design: Standard/Differential can end with double re-enforcing rings
  - Chemical Treatment: Cathodic Sodium Dichromate
  - Mill Lubricant: DOS (Di-(2-Ethylhexyl) Sebacate) & ATBC (Acetyl Tirbutyl Citrate)
  - Press Lubricant: Zurnform V or similar
  - Ends shall be cut clean and smooth and shall be free of dust, dirt, rust, etc.
  - Pre-curls shall be free of dents, clip outs or any other defect that will interfere with lid or seam
  - quality
  - End surfaces shall be free of cracks, fractures or any other defect that might permit the dough to
  - penetrate the end upon proofing.
- Explanation of Metal End Designation
  - 55# (55lb per base box), 2 CR (double reduced, 2 cold rolled passes), 0.10#ETP (1/10 lb. electrolytic tinplate), CC (continuous cast), CA (continuous annealed), DR9 (temper), (must comply with current ASTM designations A623, A626, A630)
- Assembly
  - Manufacturer's metal end shall be placed on the Tab Cut end of the can.
  - Customer's end of the tube shall be cut sharp and clean and shall be free of deformations of any sort that interfere with efficient application of customer's metal end.
- Winding Quality
  - Exterior - Cans shall be wound smooth, neat and free of cracks, tears, wrinkles, scratches through the sealant layer, excessive adhesive, torn tabs and tube flagging.
  - Interior - Liner shall appear clean with no noticeable dirt or grime and shall be smooth with no bubbles, bulges, tears, splices or dusty deposits.
- Composite Can Materials will be free of the following defects:
  - Metal Ends
    - Lipouts - Metal End not completed seamed on outside of can

- Mis-assemblies - General Seaming Defect
- Knock Out Rod Damage – Black mark on can end
- Rusty Ends
- Die Mark
- Dents

- Paper
  - Wide Butts - Two sides of the paperboard are not flush up against one another.
  - Overlap - Two sides of the paperboard overlap one another
  - Wrinkled Butt Joint or wrinkles in label
  - Busted Butt Joint
  - Flagging - Paper butt joint comes open before seaming
- Label
  - Offcuts/vertical registration, end to end registration, or label drift - Label is not properly aligned vertically on the can body. (± 3/8" (9.525 mm) from target)
  - Torn Label - Label torn along label overlap.
  - Torn Tabs - Torn in excess of 15/32" (11.906 mm)
  - Saw Marks
  - Flagging - Loose label, not folded under metal end.
  - Label Splice (Factory and Vendor)
  - Off-slit Label - White or colored line visible at label overlap.
  - Label Slip / Label Release - The internal can pressure forces the butt joint to expand which causes the label to slip sideways.
  - Label Overlap Folded Back - Backside of the label is visible because the label overlap is folded back.
  - Excessive Glue Squeeze Out - Excessive amount of Glue visible at the label overlap.
- Liner
  - Poor Heat Seals - Seal is not complete or not present across envelope fold.
  - Fold Defects/anaconda fold - Backside of liner is visible or No envelope fold is present
  - Scratched Liner - Visible scratch that actually punctures the liner to show the paper backing of the liner or body stock.
  - Glazed Liner - Liner is not glue appropriately to the body stock.
  - Dry Liner - Liner is not adhered to the body stock
  - Foil Pushdown - Liner not adhered at the bottom of the can.
  - Glue Pattern too far to the left - Target for glue application at the label overlap area not to exceed beyond overlap.
  - Glue Pattern too far to the right - Dry strip on overlap should be on the edge of the label only.
- Collar Cut
  - Deep Collar Cut - Collar cut should not be deeper than 0.010" (0.254 mm) into the board stock
  - Shallow Collar Cut - Collar cut should knives should cut sufficiently through the label and slightly into can board.
- General
  - Grease on Can Wall
  - Outside Scuff Marks
  - Fiber/Slivers Inside Can - Excessive amount of can foil/fiber in can
  - Inside Knife Flare / Curled Edges
  - Cans with palletizing damage
  - Cans that are contaminated with dirt, grease, or other foreign material

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

NOTE 3: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

APPENDIX H: RIGID PLASTICS

WORKMANSHIP

- Visual Defects - The following are considered to be visual defects and may result in the rejection of materials:
  - Flash in excess of 1/32" (0.794 mm) at parting line or strip area
  - Inclusions, carbon streaks, or specks larger than 1/32" (0.794 mm) in diameter
  - Loose or adhering foreign substances inside the container
  - Gate length or bubble trim greater than 1/16" (1.5875 mm)
  - Pressure burns
- Functional Defects - The following are considered to be functional defects and may result in the rejection of materials:
  - Short shots or containers with incompletely filled mold areas
  - Stress cracking due to improper molding conditions
  - Flash in excess of 1/64" (0.397 mm) at right angles to the seal area on containers with heat-sealing surfaces
  - Saddles/dips in a heat-sealing surface

ADDITIONAL REQUIREMENTS

- Part Identification – Each part shall have an embossed or engraved mark to allow for identification of mold cavity position
- SPI Symbol – Each part shall be labeled with the appropriate SPI recycling symbol for the type of plastic used
- Cold Temperature Crack Resistance – Each plastic container will be evaluated for its resistance to cracking at 0 degrees Fahrenheit. The plastic container must maintain its ability to withstand the established level of resistance to cracking.

NOTE 1: Where details differ between the general and individual specification, the individual specification shall take precedence.

NOTE 2: Please contact your QRO Packaging Manager for alignment on chemical migration thresholds.

NOTE 3: Printing requirements and defects are specified in the General Specification Requirements section of this manual.

APPENDIX I: METAL

This section is not available at the time of the Global Packaging Manual Pilot program. It will be added prior to the full roll-out.

APPENDIX J: PEEL-OFF COUPON AND ADHESIVE LABEL MATERIALS

WORKMANSHIP

- For coupons and stickers only include the following information on inside roll core label:
  - mmddyy-month, day, year of production
  - s – shift
  - l – web lane
- Coupons and labels shall be suitable for operation on automatic labeling equipment (i.e. Labelaire or Label Jet equipment)
- Coupons shall not stick together or demonstrate adhesive bleed when stored at 40 – 80% relative humidity and 40 – 100 degrees F (4 – 38 degrees C). When stored under these conditions, shelf-life shall be one year
- Splicing
  - Splices shall be kept to a minimum
  - Splices shall be "butt-spliced" with 1 in (25.4 mm) splicing tape on the back side of the release liner flush with the edges
  - The maximum allowable splices per roll shall be three (3)
  - The average number of splices per roll through the run shall equal one (1)
- With labeling equipment clean and maintained in good operating condition and with tensioning devices properly adjusted, the average number of web breaks per roll shall be two (2) with a range of 0 – 3. Rejection will occur on the third break
- Perforation (for peel-off coupons, if applicable)
  - The perforation pattern of the face sheet shall have a tie-to-cut relationship which will prevent the perforations from tearing during the label application
  - The backing sheet shall not have perforations
  - The coupon must be perforated well enough for customer removal
- Labels shall be free of any imperfections such as wrinkles or ragged edges which make them unsuitable for their intended use
- The label position number for the peel-off coupons should be communicated by General Mills
- The UPC code must be readable. Lasercheck report equipment is used to scan the UPC code being printed on the label. This is completed every finished press roll.
- When the coupon is removed, it must not curl in excess of 0.25 in (6.35 mm). The strength of the two bonds can be adjusted from a light release up to a hard release; however, this will not affect the coupon to remain flat once released.
- Once the coupon is removed, the coupon cannot stick to other coupons during process and handling
- All coupons and adhesive labels supplied to General Mills shall conform to the accepted workmanship practices outlined below (if applicable). While quantifiable parameters are not established, material not considered acceptable for these characteristics is subject to rejection.
  - Folds must be even
  - Materials must be cut square and not skewed more than 0.0625 in (1.5875 mm)
  - Materials must be flat and not warped more than 0.0625 in (1.5875 mm)
  - Materials must peel from backing cleanly
  - Materials should be free of excess paper or trimming
  - No crushed cores, wrong-sized cores, or loose winds

- Roll edge weave maximum = 0.125 in (3.175 mm)
- Roll skew/10 ft (3.048 m) length maximum = 0.25 in (6.35 mm)
- No external contamination including, but not limited to dirt, grease, dust, hair, etc.
- No static to the extent that the material is not runnable
- No blocking to the extent that the material is not runnable

SHIPPING REQUIREMENTS

- Container
  - Strength of the container shall meet the vibration and drop requirements of US ISTA Project 1A and the compression requirements of ASTM D4577-94 or regional equivalent test methods
  - Size will be determined by supplier
- Labeling
  - Two adjacent sides must be printed in the largest letters possible that will fit the container with: INTENDED FOR FOOD USE
  - Two adjacent sides must be printed in the largest letters possible that fit the container with
    b. Supplier Name and Address
    c. Quantity per Case
    d. Production Code (date and shift)
    e. Material Number: TBD
    f. Purchase Order Number (to supplied by GMI Purchasing)
    g. Sequential Carton Number (1 of ...)
- Packing and Closure
  - The items are to have uniform orientation in master carton
  - There is to be no banding
  - Product must be properly protected to prevent damage during packing, shipping, and storage
  - Cartons must be sealed with 2 in (50.8 mm) tamper evident tape in an "H" pattern on the top and bottom of the cartons. Metal closures are prohibited.
  - Master carton minor flaps in and major flaps out on both top and bottom of master cartons.
- Weight
  - Container cannot exceed 35 lbs (12 kg); unless specified by vendor
- Carton Liner
  - Cartons shipping to a GMI manufacturing plant must be lined with a 1.5 mil (minimum) LDPE poly bag
  - Poly liners must not be sealed with tape or metal closure; bag shall be folded over
- The following procedures apply only to Coupon/Sweepstakes Cards:
  - Destruction procedures are as follows:
    - The plates are to be destroyed
    - Print waste should be kept in a secured area until destroyed. Print waste must be destroyed within 24 hrs of production run.
    - If game negotiable instruments are to be shredded by a firm other than the printer, the negotiable instruments should be damaged by cutting prior to shredding. Precautions must be taken to ensure that there is no exposure to theft before actual destruction by shredding.
    - Destruction of all items must be witnessed and/or documented. Proof of destruction will be provided to GMI upon request.

- Production areas should have security precautions to prevent unauthorized personnel from having access to the printing processes/ materials and printing waste
- Storage of negotiable material should provide adequate security against theft or exposure to confidential game/promotional plans
- General Mills reserves the right to witness the actual printing and waste destruction of any winning game piece/coupon production.

APPENDIX K: LETTER OF GUARANTY

GENERAL MILLS, INC.
PACKAGING MATERIAL GUARANTY

Specification	**Supplier and/or Distributor Name :***

***If you are a distributor, please list your company and also the name of the packaging supplier you distribute for.**

TYPE OF FOOD: **CONDITIONS OF USE:**

Material Structure (Outside to Inside)	**Component Manufacturer/Designation**	**CFR Reference for each layer**

The undersigned (hereinafter called the "Seller") does hereby guarantee to GENERAL MILLS OPERATIONS, INC. of Number One General Mills Blvd., Minneapolis, MN 55426 and its parent, affiliates and subsidiaries (hereinafter called the "Buyer") that the above described Material, considering its components (including, but not limited to, processing agents, additives, lubricants & cleaning agents that could migrate to the food contact surface, or otherwise create flavor or odor changes in the food product) and the above described Conditions of Use and Types of Food hereafter sold by Seller to Buyer do and shall at the time of delivery, either be composed of components that are Generally Recognized as Safe, are prior sanctioned, or in all respects comply with the Federal Food, Drug, and Cosmetic Act of 1938, and all acts now or hereafter amending or supplementing the same (including, without being limited to, the Food Additives Amendment of 1958, and all applicable state laws, and where applicable, the Wholesome Meat Act or Wholesome Poultry Act), and are not and shall not be at the time of delivery adulterated or misbranded within the meaning of said acts or laws, and will not cause a product of Buyer, taking into account the Type of Food and Conditions of Use specified above, to be adulterated or misbranded, and are not and do not contain a misbranded hazardous substance or a banned hazardous substance. This is to further guarantee that the above described Material is manufactured from high purity raw materials under conditions which assure its safety for its intended use as described above by the Types of Food and Conditions of Use, and where applicable, meet the certification requirements found in Fabrication of Single-Service Containers and Closures for Milk and Milk Products. This is a continuing guaranty and shall be in force until revoked in writing by the Seller or until such time that another guaranty statement is requested and signed.

The Seller also guarantees the Material does not contain any intentionally added lead, hexavalent chromium, cadmium or mercury and the sum of the incidental concentration levels of these four metals if present in the Material does not exceed 100 ppm by weight. The Seller also guarantees that the Material does not contain any substance, including without limitation any of the foregoing substances, listed pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) in an amount that would require a warning to Buyer's employees or others exposed to Buyer's product incorporating the Material.

Signature	Name (print)		Date
Title	Phone	Email	
Company Name			
Company Address			