



TECHNICAL CODE OF PRACTICE CONTENTS

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PART 1 – CODE OF PRACTICE

1. INTRODUCTION TO TECHNICAL MANUAL

ASDA is a Wal-Mart company and as such follows Wal-Mart corporate policy. Wal-Mart has enjoyed success by adhering to three basic principles since its founding in 1962:

- Providing value and service to our customers by offering quality merchandise at every day low prices.
- Corporate dedication to a partnership between Wal-Mart colleagues, ownership and management. This concept is extended to Wal-Mart's supplier partners.
- A commitment to the communities in which the stores and distribution centres are located.

ASDA Mission Statement

ASDA and each of our suppliers, including our Supplier Partners outside the United Kingdom, are expected to conform to those principles and to assure compliance in all contracting, sub-contracting or other relationships.

The conduct of Supplier Partners (suppliers and their factories) can be transferred to ASDA and effect its reputation, ASDA requires that Supplier Partners conform to standards of business practice consistent with the three basic principles above.

ASDA will maintain an open and interactive partnership between the supplier and ASDA in order to develop Private Label products.

Where the factory has direct dealings with ASDA, they shall have both supplier and factory responsibility in reference to this document.

- It is the responsibility of the supplier to ensure that the design and/or specification agreed with ASDA is achievable in factory production, and the specification is translated into clear process control parameters and work instructions.
- Representatives from ASDA must be given access to manufacturing sites for the purpose of ensuring due diligence.
- It is the responsibility of the supplier to inform ASDA of any issues that could affect product safety, legality or quality during product development or production as soon as it becomes apparent.
- It is the responsibility of the supplier to inform ASDA of any issues that could compromise factory workers health and safety or cause environmental problems during stages of product development or full scale production.

Any technical or quality issues may result in an investigative visit by or on behalf of ASDA at the supplier's expense.



SCOPE

This manual is applicable to all Private Label products and products where ASDA is the importer of record.

PARTICIPATION MATRIX

	Own Label Domestic or Direct Import	High Branded Direct Import	Low Recognition Brand Direct Import	Domestic Branded
	Asda Brand / Wal-Mart (e.g. Kids Connection)	Via GP Inc exclusives	Tertiary Brands Inc exclusives	
Factory Audit	Yes	Yes	Yes	No
Product Appraisal	Yes	No	Yes	No
Product Testing	Yes	Yes	Yes	No
Pack Copy	Yes	No	Review	No
Product specifications	Yes	No	Yes	No
Sealed Samples	Yes	No	Yes	No
Rationale	Concern for quality, image and hierarchy	Legal, safety and due diligence	Recognised as Asda rather than a brand and therefore customer expects more from us. Review what controls the supplier has in place (e.g. Technical Manager, affinity with product etc)	Provide support on issues where needed.

Further reference to Private Label products should be read to include items where ASDA is the importer of record (any brand).

ASDA will only purchase Private label products from approved suppliers who can demonstrate due diligence covering 4 key items:

- Product development, taking into account safety, legality and quality in the country of sale.
- A specification to define key materials, designs, measurements and other parameters to allow consistent achievement of the above for product and for packaging.
- Testing tailored to ensure the specification and all legal requirements are met.



- A factory base capable of producing the product consistently to be safe, legal and of agreed quality.

It is the supplier's responsibility to ensure that final product supplied to ASDA is in all respects identical to product that passes independent testing and to any reference sample kept by the supplier.

Manufacturing processes and materials can have influence on the finished product safety, legality and quality. The ASDA Technical Team (please see contacts list for details) must be informed immediately if:

- The product is produced at a different factory than originally agreed. The product shall be assessed as a new item and will require it's own due diligence
- The manufacturing process changes from the process used for samples submitted and/or outlined on the specification. The product shall be assessed as a new item and will require it's own due diligence
- The raw materials are different than those used for samples submitted. This includes colour changes.
- The origin of raw materials changes.
- The design deviates from the one agreed in any way however small.

In each case, a new sample must be submitted to ASDA for approval and the full suite of testing carried out.

The policies set out the contractual obligations for the supply of Private Label products to ASDA. The Technical Manual is in addition to any legal obligations in relation to the products supplied. This document is not exhaustive, and expert advice must be sought where appropriate.

It is the Supplier Partner's responsibility to communicate the ASDA code of practice, policies and technical manual through the supply chain to ensure compliance.



2. PRODUCT RISK MANAGEMENT

This document must be read in conjunction with the BRC Global Standard Consumer Products October 2006 2nd edition (**The Standard**). This document is available from 'The Stationary Office' on www.tso.co.uk . ISBN 0-11-703676-5 or the BRC bookshop: <http://www.tsoshop.co.uk/brcbookshop/bookstore.asp?FO=1235945>.

Suppliers are responsible for furnishing factories with the standard and ensuring its implementation as well as organising a verification audit (see Audit policy)

When applying **the Standard**, the Product Group classification for risk management within a factory must be agreed with the ASDA Technical services manager.

The supplier is responsible for ensuring an appropriate risk management system is in place within the factory. Risk assessment must cover all operations from raw material and packaging purchase through the manufacturing process to despatch, including off site warehousing and transit vehicles.

The supplier must have access to relevant documentation regarding safety and legality (including but not limited to copies of legislation and The Standard and shall be able to demonstrate understanding of factors relating to the safety and legality of the products for sale in ASDA stores throughout the supply chain. The supplier shall be able to demonstrate that all factories used to produce ASDA product have the ability to manufacture consistently to ASDA specification.

3. CONSUMER PRODUCT MANAGEMENT SYSTEM

The factory shall have a documented consumer product policy clearly stating their commitment to produce safe and legal products and incorporating ASDA requirements. The policy must be signed and dated by the most senior factory official and communicated to and understood by all workers.

It is the responsibility of the supplier to ensure that there is appropriate resource and investment within the factory to meet safety, legal and ASDA quality requirements.

The supplier must be able to demonstrate factory approval and monitoring processes for every factory used to produce ASDA products.

The factory must control their purchasing process to ensure product safety, legality and quality. They must demonstrate approval and monitoring processes for their suppliers (including but not limited to component suppliers and packaging suppliers).

The factory must maintain records that demonstrate effective control of product safety, legality and quality for a period of 7 years or longer as agreed with the ASDA Technical Services Manager. The records must be genuine, legible and authorised by a senior factory official.

Non-conformities relating to product safety, legality or quality, either evident during production or as a result of consumer enquiry, must be investigated. This investigation must be documented by the factory, corrective action agreed and clearly recorded with timescales appropriate to the level of risk. Responsibility for corrective action must be clearly assigned to a named individual and carried out in a timely manner.



ASDA must be notified immediately of any occurrence that may compromise product safety, legality or quality, potentially resulting in harm, personal injury or property damage through manufacturing, supply chain or during foreseeable customer use (please see Product Crisis policy).

4. SITE ENVIRONMENT STANDARDS

The factory premises must meet all relevant local legislation.

The site shall be clearly defined and shall be located and maintained so as to enable the production of safe and legal product. In particular measures must be in place to prevent product contamination.

Measures must be in place to maintain site security. Procedures must be in place to control authorised and unauthorised access to the factory. Engineers and external contractors must be made aware of and adhere to the company procedures to prevent product contamination.

Premises and fabrication, machinery and equipment shall be designed, constructed and maintained to control the risk to product safety, legality and quality, with appropriate storage for chemicals.

Adequate lighting must be present in all working areas to permit effective manufacturing, inspection of product and cleaning.

Where there is a risk of physical contamination to the product, the product shall be protected and/or the source eliminated.

Premises (including canteen, toilets and drains), equipment and all product (including work in progress) must be clean. This should include perimeter areas. Cleanliness should be monitored on a regular basis.

Cleaning chemicals and equipment shall be identified and their use controlled to prevent product contamination.

Systems shall be in place to prevent waste accumulation.

Inspection procedures must prevent the use of unfit, defective or counterfeit components or raw materials.

The company is responsible for identifying and controlling the risk of pest infestation on the site and shall have pest control measures, where appropriate, to minimise risk. Chemicals or materials used, must not be in contact with raw materials, work in progress or final product at any time.

No animals are allowed anywhere on the premises.

Incoming raw materials and packaging should be checked for any signs of infestation. Any material affected must be rejected.



5. PRODUCT CONTROL

The supplier is responsible for product design and development. Suppliers must maintain documentary records to demonstrate that the product design, formulation, materials, components and manufacture have been assessed for possible effects on safety, legality and quality.

Any amendments to the product requested by ASDA must be assessed as above and if safety, legality or quality of a product is adversely affected as a result, this must be highlighted in writing to ASDA and a written response must be received before proceeding with further amendments or production.

The supplier must do a risk assessment during the development process based on the reasonably foreseeable use of the product not just the intended use. This must include consideration of packaging, instructions and warnings. Due regard must be had to the category of consumer in the intended market (i.e. babies; infants; children; adults; the elderly). Any changes made to the product must be risk assessed.

All changes to any original design must be approved by ASDA.

Packaging, components and raw materials must be purchased against an agreed specification. They must be stored in such a way as to minimise final product contamination.

6. PROCESS CONTROL

The factory is responsible for controlling processes, identified during risk assessment as being critical to product safety, legality and quality. This shall include equipment and labour as well as environmental issues. The verification of these controls must be documented.

Samples shall be approved by appropriate ASDA colleagues and maintained for reference at the factory for 18 months after ASDA approval. The sample shall be stored in conditions so as to maintain their original condition. If the place of manufacture changes then new samples must be sent to the ASDA Development Technologist for approval.

7. PERSONNEL

Smoking, eating and drinking shall only be permitted in designated areas where this poses no product contamination risk.

Cuts, grazes and infections on exposed skin must be covered by a suitable dressing.

Basic personal hygiene standards must be enforced, including hand cleaning after use of sanitary facilities, smoking or food consumption and at regular intervals. Policies must include provision for the wearing of suitable clothing and footwear. A jewellery policy must be in force.

All contractors or visitors to the site must be aware of the personal hygiene and safety requirements.

The supplier must ensure that every factory ensures all workers and contract workers are adequately trained to produce safe and legal product that meets ASDA requirement.



APPENDIX 1 Document control procedure

The factory must ensure that documentation, records and data critical to ensure ASDA products are safe, legal and of agreed quality, is controlled.

Written policies, procedures, work instructions and checks and records recorded during production must be issued, signed and dated by a senior factory official. The issue of each copy to the relevant party must be documented.

Only formally issued documents shall be used and any unauthorised (photo) copies discarded.

When a document is updated, the reason for update must be recorded. The document must be given a consequential issue number and issued to relevant parties and preceding copies collected.

All obsolete documentation must be collected and destroyed or put in a separate file. This must be documented.



APPENDIX 2 Traceability Procedure

It is the responsibility of the supplier to ensure that the factory is capable of tracing raw materials and components from their suppliers to finished product as sold to ASDA.

Background

In order to comply with General Product Safety Regulations 2005 there is a requirement for ASDA to be able to trace back to origin for the life cycle of the product. There is an expectation that the supplier can do the same.

Implementation

The factory must record raw materials and components delivered. The record must show the name of supplier, the date of delivery, the delivery quantity and the parameters against they were purchased. This must be signed and dated by a senior factory official. The records shall be kept for 7 years after final use of the delivery.

The raw materials and components shall be identified with identifying name or number and date of delivery to ensure affective stock control.

There shall be a mass balance from raw materials and components to final product despatched to ASDA this shall be demonstrable at request.

In product categories, where deemed necessary, such as toys and electronics, batch coding is required to allow a forward trace (from raw material or component batch to final product) or backward trace (final product back to raw material and component origin). This batchcoding must be legible and indelible on the product during foreseeable use.

In this case the factory must be able to identify specific raw material or component batches incorporated within the product. The usage records must be completed during production, checked, signed and dated by a senior factory official.
Any rework used must be fully traceable.

ASDA reserve the right to periodically test the system either by means of an on site inspection or a telephone/computer type exercise. These tests may be unannounced.

All records must be kept and be available for inspection for 7 year.



APPENDIX 3 Product Contamination Procedure

Suppliers are responsible to ensure that factories control and where possible eliminate physical, biological or chemical sources of potential contamination. These shall be identified within the factory risk assessment.

It is recognised that each industry has inherent risk factors and these are identified below with recommended procedures.

Needle Control Procedure

Note: The term Needle(s) includes all sewing needles (machine and hand sew), knitting needles, and ticketing guns (Kimball)

All needles or parts of broken / damaged needles must be routinely accounted for throughout the production process.

• Needle Change During Production:

In order to prevent needle breakage and product damage, it is recommended that needles are changed as per below. In each case, this must be recorded and all needles accounted for. Any damage to needles must be recorded and pieces accounted for. This must be signed and dated by a senior factory official.

- Needles in machines being constantly used should be changed every day to pre-empt needle breakage and avoid needle damage or worn ball points.
- Every time there is a change in the nature of the fabric on the production line, a change of needle(s) should be carried out on all machines involved.
- A daily, routine check of all machines must be carried out by the mechanic and where appropriate the needle must be changed.
- Any issues noted during routine work in progress or product inspection must be traceable to the machine involved and needles must be changed.
- A broken or damaged needle must always be replaced with a brand new needle. This must be demonstrated with materials balance.
- Needles can only be replaced by appropriately trained and senior personnel.

• Control of Sewing Needles:

- Needles must be kept in clearly marked, locked storage and issued by a nominated responsible person.
- Needles must only be issued on a one for one basis e.g. in exchange for a blunt, broken or otherwise exchanged needle. All pieces must be accounted for and documented.
- If any parts of the broken needle are not found, any work in progress must be isolated and removed to a separate location. The isolated stock must then be thoroughly checked using a metal detector in order to locate the missing fragments. If these are not found, then work in progress must not be used for ASDA products. This must be recorded.



- A responsible person must be nominated to oversee compliance with procedures and carry out audit procedures / random checks to ensure compliance by operatives.
- All old needles to be stored in a separate container away from the new needles, and should be recorded / accounted for and carefully disposed of, off the premises.
- A daily needle use record sheet to be maintained for all machines and maintained. In case of no replacement/breakage this shall be clearly stated. All records signed by a senior factory official.
- All records must be maintained for 7 years from the date of production.
- **Hand Sewing**
 - Hand sewing should only be used where an automated solution is not feasible.
 - All hand sewing needles must be held by the line supervisor and issued at the beginning and collated at the end of each shift.
 - Procedures for the replacement of broken / lost needles must follow the Broken Needle Control requirements as above.

Blades and sharps procedure

- The use of pins and staples must be avoided in final product or its contact packaging.
- Where it is deemed necessary to use heavy duty staples in cartons for items such as electronics and furniture, these items must be issued and accounted for by a responsible person. There must be a check in place to ensure no loose staples are found in the finished pack.
- Equipment such as clippers and scissors must be securely attached to the workstation or machine. Where this is not feasible, and for other tools such as drill hole spikes, Kimball needles, notch punchers, tweezers etc they should be kept in a controlled environment and a responsible person should be appointed to routinely count them out and in at the beginning and end of shifts. This must be recorded, signed and dated by a senior factory official and records kept.
- Stanley knives with blades that snap off must not be used.
- Knives must be kept in clearly marked, locked storage and issued by a nominated responsible person at the start of a shift and accounted for at the end of a shift. Any anomalies must be documented and signed and dated by a senior factory official.
- New blades must only be issued in exchange for a blunt or broken knife. All pieces must be accounted for and documented.
- If any parts of the broken knife are not found, any work in progress must be isolated and removed to a separate location. The isolated stock must then be thoroughly checked using a metal detector in order to locate the missing fragments. If these are not found, then work in progress must not be used for ASDA products. This must be recorded.



- A responsible person must be nominated to oversee compliance with procedures and carry out audit procedures / random checks to ensure compliance by operatives.
- All old knives to be stored in a separate container away from the new knives, and should be recorded / accounted for and carefully disposed of, off the premises.
- All records must be maintained for 7 years from the date of production.

Metal detection procedure

Metal Control (requirement for any textile or soft toy manufacturers and implemented where appropriate for other manufacturers)

- The factory must implement an ongoing maintenance schedule in order to prevent metal contamination from either the equipment or the environment. This shall include a full inventory of equipment and confirmation that it is in tact. This must be signed by a senior factory official.
- Where it is noted that metallic parts of equipment or environment are not in tact, this must be recorded. If the missing parts cannot be located, all product produced since this was last noted as complete, must be passed through the metal detector equipment to ensure it is free from contamination.
- Where a metal contaminant is found, an investigation must be initiated into its possible source and the results should be documented, with corrective action as necessary.

Metal Detection equipment

- Metal detectors need to be installed on the production line and allow for individual items to pass through at the end of the production process.
- The metal detector should be able to detect any metal part equivalent to the diameter of a 1.2mm ferrous sphere.
- The detector must be calibrated every 12 months to demonstrate that it can detect a 1.2mm ferrous sphere test card (The sphere should be chrome steel of AISI 52100 grade with AFBMA GD 10 size tolerance) effectively.
- The detector must be checked for effectiveness at the start of each shift, change of product batch and every hour. This must be recorded, signed and dated by a senior factory official. It shall be traceable to a specific product batch.
- The detector must have an audible alarm with automatic belt stop when metal is detected.
- Metal detectors should be installed in compliance with manufacturers guidelines.
- Designated staff should be fully trained by manufacturers personnel prior to operating machinery. Only authorised personnel should use the metal detector.
- When metal contamination is detected the product must be isolated and the source found. If



this can be removed the product can be reworked and released into stock.

If the metal contamination is not found or cannot be removed without damaging the product, it must be destroyed.

- All incidences of metal contamination detected must be recorded and pieces of contamination kept. The records shall be signed and dated by a senior factory official.

Glass Control procedure

(The term glass refers to glass items, windows, protective shields and includes perspex, ceramics and polycarbonate)

- There shall be a risk assessment of the environmental factors that can affect the product.
- If as a result, glass has been identified as a hazard, the product must be protected. Where possible glass must be replaced.
- All glass must be inspected on a regular risk assessed basis for signs of damage. All findings must be recorded with corrective action as necessary.
- Glass must not be introduced into the factory either as raw materials containers or personal items.
- No glass shards must be contained within or on the final product. This shall result in a full product recall at the supplier's cost.
- A documented glass breakage procedure must be available to all personnel. This must cover:-
 - Immediate line stoppage and isolation of products.
 - Prevention of personnel/equipment movement through the affected area.
 - Reporting of incident to 1 of 2 nominated senior site managers.
 - Systematic cleaning and in depth inspection of the area.
 - Authorisation as clear prior to production commencing.
 - Full documentation of the incident and sign off by a senior company official.
 - Disposal of ingredients, work in progress and end products, in the vicinity of the breakage.



APPENDIX 4 Pest Control Procedure:

Background:

To ensure premises are constructed and maintained, and good manufacturing process observed, in order to comply with legislation and to protect from any pest related contamination, at all stages from goods inwards through to end product despatch.

Chemicals or materials used, must not be in contact with raw materials, work in progress or final product at any time.

Implementation:

- The factory is responsible for identifying and controlling the risk of pest infestation on the site and shall have pest control measures, where appropriate, to minimise risk.
- Where appropriate, the company shall contract a recognised pest control organisation. The organisation should provide :
 - Documented contract detailing the number and types of visits and the pests covered.
 - Site plan showing the positions of the baits. Internal and external.
 - Action reports, detailing action required and responsibility
 - Pest control file for each site

Contractors must be in a position to provide technical advice and an emergency call-out for 24 hours a day and seven days a week.

A field biologist must audit each site at a risk assessed frequency basis.

- If a pest control organisation is not practical then there must be trained personnel for the regular inspection and treatment of premises to deter and eradicate infestation.
- No animals are allowed anywhere on the premises.
- Incoming raw materials and packaging should be checked for any signs of infestation. Any material affected must be rejected.
- Where appropriate electric fly killers should be provided
- The company must ensure their pest control operation and pesticides used comply with any relevant national legislation.
- Data sheets should be kept for all pesticides used so they can be referred to in case of any risk of product contamination.
- Detailed records of pest control inspections, recommendations and actions taken must be kept.
- All infestations of rodents must be under control within three days of the first sighting. If infestation continues for longer than seven days Wal-Mart must be informed.
- All actions taken, as a result of pest control recommendations, must be clearly entered on the record sheet and then signed off once completed by the pest control representative within the company.



APPENDIX 5 Control of Non-Conforming Material, including Final Product Procedure

ASDA shall not accept finished product, which does not conform to testing requirements, specification or approved sample.

Raw Materials for ASDA products

Where an incoming material is found to be out of specification it must be isolated and labelled. It must then be destroyed or returned to the supplier, and an investigation conducted. This must be recorded for future reference.

Work in progress for ASDA products

Where work in progress is found to be out of tolerance it must be isolated and labelled and, where possible, brought back to specification.

An investigation must be carried out. If the non conformance is due to processing, no further production shall occur until the issue is resolved.

Any material that cannot be amended to comply to specified parameters, shall not be used in ASDA finished products.

Finished ASDA products

In case of non compliance, advice must be sought from the ASDA technical team and a course of action agreed in writing.

ASDA shall raise a concession against a product in exceptional circumstances only. In all other cases product must be altered to comply.

Disposal of non conforming material

If the product is unacceptable to ASDA and the decision is made to sell the product to jobbers or staff, it is the supplier's responsibility to ensure that the factory removes the ASDA label on both the outer and primary packaging. This is a legal requirement.

If the product is found to deviate from the specification and/or approved sample at any stage during product development, production or the supply chain, the supplier shall be responsible for communication to ASDA technical team and to ensure this material shall not be sold in ASDA stores. Should product be in the supply chain already, the supplier shall recover stocks from store, depot or ship and reimburse ASDA as per supplier agreement.

No out of specification private label product is to be released for distribution to ASDA without the written authority of ASDA senior management.



APPENDIX 6 Customer Complaints Procedure

ASDA have systems in place to record and trend customer complaints and returns. Where possible, complaint items are examined by the ASDA technical team and if necessary, forwarded to the supplier.

The supplier must have a documented system in place to investigate each complaint thoroughly with the factory and the cause of non conformance identified. This must indicate the specific person responsible for handling complaints.

The supplier is responsible to ensure the factory has a documented complaints system.

A system must be established to collect and analyse all complaint data. This should be by product type, nature of complaint, retailer and customer.

The returns data is available from Retail Link and it is the supplier's responsibility to access this information at regular intervals and take action accordingly.

If the response involves the forwarding of factory due diligence information only, a reasonable time scale is 24 hours. Should further testing or examination be required, time scales must be agreed with ASDA technical team.

The outcome of all customer complaint investigations must be clearly documented and communicated to the ASDA technical team.

If the complaint is suspected or known not to be an isolated incident, this must be immediately communicated to the ASDA technical team. See the Crisis management procedure.

A review must be carried out at factory level after each complaint or high returns. Resulting actions must be recorded, with owners and timescales assigned.

If the product, production process or raw materials used alter as a result, samples must be forwarded to ASDA Technical team for further approval prior to production.

There is a cost associated with each customer complaint received by ASDA this is detailed in your supplier agreement.



APPENDIX 8 Traceability

It is the responsibility of the supplier to ensure that the factory is capable of tracing raw materials and components from their suppliers to finished product as sold to ASDA.

Background

In order to comply with General Product Safety Regulations 2005 there is a requirement for ASDA to be able to trace back to origin for the life cycle of the product. There is an expectation that the supplier can do the same.

Implementation

The factory must record raw materials and components delivered. The record must show the name of supplier, the date of delivery, the delivery quantity and the parameters against they were purchased. This must be signed and dated by a senior factory official.

The raw materials and components shall be identified with identifying name or number and date of delivery to ensure affective stock control.

There shall be a mass balance from raw materials and components to final product despatched to ASDA this shall be demonstrable at request.

In product categories, where deemed necessary, such as toys and electronics, batch coding is required to allow a forward trace (from raw material or component batch to final product) or backward trace (final product back to raw material and component origin). This batchcoding must be legible and indelible on the product during foreseeable use.

In this case the factory must be able to identify specific raw material or component batches incorporated within the product. The usage records must be completed during production, checked, signed and dated by a senior factory official.
Any rework used must be fully traceable.

ASDA reserve the right to periodically test the system either by means of an on site inspection or a telephone/computer type exercise. These tests may be unannounced.

All records to support the traceability policy must be kept and be available for inspection for 7 years after production.