



## FeedSafe® Audit Checklist Ver.12 to Ver.13 Comparison Report

The purpose of the update of the FeedSafe® Checklist from version 12 to version 13 was to provide a clearer structure as well as remove repetition of questions. The principles remain unchanged. The questions are mostly unchanged (some small rewording where two questions have been merged into one to reduce repetition as required).

This report provides a direct comparison of the old numbering system in version 12 to the new numbering system in version 13 to ease manufacturers and auditors.

Below is the table of contents of the FeedSafe® Checklist version 13.

<b>1</b>	<b>CERTIFICATION RULES</b>	<b>6</b>	<b>PURCHASING &amp; SUPPLIERS</b>
<b>2</b>	<b>GOOD MANUFACTURING PRINCIPLES</b>	<b>6.1</b>	<b>SUPPLIERS</b>
<b>2.1</b>	<b>SITE</b>	<b>6.2</b>	<b>RECEIVALS</b>
<b>2.2</b>	<b>EQUIPMENT</b>	<b>7</b>	<b>SAMPLING &amp; TESTING</b>
<b>2.3</b>	<b>STORAGE</b>	<b>7.1</b>	<b>SAMPLING &amp; TESTING PROGRAM</b>
<b>2.4</b>	<b>VENTILATION</b>	<b>7.2</b>	<b>RETENTION SAMPLES</b>
<b>2.5</b>	<b>WASTE MANAGEMENT</b>	<b>7.3</b>	<b>VENDOR DECLARATIONS</b>
<b>2.6</b>	<b>CROSS CONTAMINATION CONTROL</b>	<b>8</b>	<b>PRODUCTION</b>
<b>2.7</b>	<b>CLEANING</b>	<b>8.1</b>	<b>VALIDATIONS</b>
<b>2.8</b>	<b>PEST CONTROL</b>	<b>8.2</b>	<b>MANUFACTURING</b>
<b>2.9</b>	<b>MEDICATIONS &amp; CHEMICALS</b>	<b>8.3</b>	<b>NON-CONFORMANCES</b>
<b>2.10</b>	<b>RAM</b>	<b>8.4</b>	<b>REWORKS</b>
<b>3</b>	<b>PERSONNEL &amp; TRAINING</b>	<b>9</b>	<b>TRANSPORT</b>
<b>3.1</b>	<b>JOB DESCRIPTIONS &amp; ORGANISATION CHART</b>	<b>9.1</b>	<b>LOADING</b>
<b>3.2</b>	<b>TRAINING</b>	<b>9.2</b>	<b>TRANSPORT</b>
<b>3.3</b>	<b>HYGIENE</b>	<b>9.3</b>	<b>BULK DELIVERY</b>
<b>3.4</b>	<b>VISITORS &amp; CONTRACTORS</b>	<b>10</b>	<b>MOINTORING &amp; IMPROVEMENT</b>
<b>4</b>	<b>DOCUMENT CONTROL</b>	<b>10.1</b>	<b>CUSTOMER COMPLAINTS</b>
<b>4.1</b>	<b>FORMULATIONS</b>	<b>10.2</b>	<b>CORRECTIVE ACTIONS</b>
<b>4.2</b>	<b>RECORDS</b>	<b>10.3</b>	<b>RECALLS</b>
<b>4.3</b>	<b>SPECIFICATIONS</b>	<b>10.4</b>	<b>INTERNAL AUDITS</b>
<b>5</b>	<b>HAZARD RISK ASSESSMENT (HACCP)</b>	<b>11</b>	<b>BIOSECURITY</b>
<b>5.1</b>	<b>HACCP TEAM</b>		
<b>5.2</b>	<b>HAZARD ASSESSMENT</b>		
<b>5.3</b>	<b>CCP MANAGEMENT</b>		

V12 #	GMP Condition	V13 #
	<b>REQUIREMENTS FROM RULES</b>	
A.	Is the site being audited a member of SFMCA?	1.1
B.	Are the following current documents available by staff: a) the current version of <i>FeedSafe® Standard - Australian Code of Good Manufacturing Practice for the Feed Manufacturing Industry</i> (as amended or superseded) b) the current version of the FeedSafe® Certification Rules c) the National Biosecurity Manual for Feed Mills (as amended or superseded) d) the approved Manufacturing site's quality system manual e) relevant safety data sheets for all materials stored on site	1.2
C.	Who is the QA Officer for the site?	1.3
D.	What is the manufacturing tonnage for the past 12 months?	1.4
E.	Does the site have planning permission from the local shire?	1.5

V12 #	GMP Condition	V13#
<b>1.</b>	<b>HAZARD RISK ASSESSMENT</b>	(V13 heading)
1.1.	Has a site hazard food safety risk assessment been completed and is it annually reviewed?	5.2.1 Hazard Assessment
1.2.	Does the risk assessment plan utilise HACCP principles, identifying risk areas and provide methods of managing these risks?	5.2.2 Hazard Assessment
1.3.	Are internal audits undertaken to ensure the requirements within this Audit Checklist are being met between annual FeedSafe audits.	10.4 Internal audits
<b>2.</b>	<b>PREMISES AND MILL BUILDINGS</b>	
2.1.	Is a site plan for the entire premises available?	2.1.1 Site
2.2.	Does the site have suitable drainage?	2.1.2 Site
2.3.	Are roadways maintained in good condition, dust and mud being minimised?	2.1.3 Site
2.4.	Can raw materials and finished feeds be unloaded and/or loaded without significant water damage resulting?	2.1.4 Site
2.5.1	Where the mill manufactures ruminant feeds, are separate receival hoppers available for handling Restricted Animal Material (RAM)?	2.10.1 RAM
2.5.2	If there is not a separate receiving hopper for RAM, are written procedures in place and followed to prevent cross contamination of non-RAM raw materials being received?	2.10.2 RAM
2.5.3	Are these procedures verified through inspection, sampling and testing?	2.10.3 RAM
2.6	Is ventilation or dust extraction units adequate to prevent accumulation within mill buildings of steam, dust and other airborne contaminants?	2.4.1 Ventilation
2.7	Are the buildings, grounds and machinery cleaned regularly?	2.7.2 Cleaning
2.8.1	Is there a written mill cleaning procedure and schedule?	2.7.1 Cleaning
2.8.2	Is there a system to verify the adequacy of the mill hygiene program?	2.7.3 Cleaning
2.9	Is site security sufficient to ensure that accidental or deliberate contamination of product is avoided or prevented?	2.1.5 Site
2.10	Are there written procedures controlling both visitors and contractors entering the site?	3.4.1 Visitors & Contractors

2.11	Is there a written procedure to make all site visitors aware of their potential impact on product safety, quality and the environment?	3.4.2 Visitors & Contractors
2.12	Does the site have a written pest control management program?	2.8.1 Pest Control
2.13	Is waste and contaminated material controlled and regularly removed from the site?	2.5.1 Waste Management
2.14	Are waste containers clearly identified and maintained to ensure waste material is contained and not incorrectly used? Where bulk or bag material is held for waste disposal, is it adequately labelled to ensure it is not incorrectly used?	2.5.2 Waste Management
<b>3.</b>	<b>PERSONNEL</b>	
3.1.	Are qualified and/or experienced persons directly responsible on site for manufacturing operations?	3.1.1 Job Descriptions & Org chart
3.2.	Are employees provided with written duties?	3.1.2 Job Descriptions & Org chart
3.3.1	Are employees trained in GMP as it relates to their duties?	3.2.1 Training
3.3.2	Is completed training (including GMP training) documented in employee records?	3.2.2 Training
3.4.1	Is there a training program and are staff adequately trained to competently carry out their assigned tasks?	3.2.4 Training
3.4.2	Does training encompass actions impacting on product safety, quality and the environment?	3.2.5 Training 3.3.1 Hygiene
3.4.3	Is there specific training related to the ruminant feeding ban including storage, handling and use of restricted animal materials?	3.2.6 Training
3.5	Are maintenance staff trained to identify equipment faults which impact on product quality and safety?	3.2.10 Training
<b>4.</b>	<b>PLANT AND EQUIPMENT</b>	
4.1.	Is appropriately designed and constructed equipment installed to meet the requirements of manufacturing stock feed?	2.2.1 Equipment
4.2.	Is equipment in use designed and maintained to prevent contamination during the manufacturing process?	2.2.2 Equipment
4.3.	Is appropriate dust extraction equipment installed?	2.4.2 Equipment
4.4.	Is equipment designed and installed to allow for routine cleaning, maintenance and inspection?	2.2.3 Equipment
4.5.1	Is a preventative maintenance program in use?	2.2.4 Equipment
4.5.2	Is there a system of logging maintenance work when completed?	2.2.5 Equipment
4.6.1	Are monitoring and/or controlling devices (weigh scales, temperature probes, flow meters, etc) monitored for accuracy and recalibrated when required?	2.2.6 Equipment
4.6.2	Are records kept of calibration monitoring?	2.2.7 Equipment
4.7	Do appropriately trained personnel carry out maintenance and calibration of equipment?	3.2.10 Training
<b>5.</b>	<b>RAW MATERIALS – SOURCING/PURCHASING</b>	
5.1.	Is there a documented purchasing program implemented with emphasis on raw material quality and safety risks?	6.1.2 Suppliers
5.2.1	Is a copy of raw material purchasing standards kept on site; these may be GTA, other recognised industry standards or individual site acceptance standards?	6.1.3 Suppliers
5.2.2	Does the purchasing standard or purchase contract include reference to grain treatment withholding periods?	6.1.4 Suppliers

5.2.3	Are suppliers made aware of the quality standard in use and are they supplied with copies of the purchasing standard where appropriate?	6.1.5 Suppliers
5.3	Does the site maintain a register of compliant raw material suppliers?	6.1.1 Suppliers
5.4	If unlabelled bagged restricted animal material is purchased, is such material either relabelled prior to storing on site or rejected and returned to the supplier?	2.10.5 RAM
<b>6.</b>	<b>RAW MATERIAL RECEIVAL – INSPECTION, SAMPLING AND TESTING</b>	
6.1.	Is every load of incoming raw materials cross-referenced to purchasing documentation?	6.2.2 Receivals
6.2.	Is a record of the origin, date of receipt and quantities of each raw material received kept on file?	6.2.1 Receivals
6.3.	Where external third-party vehicles are delivering raw materials, is confirmation of what the previous load carried recorded?	6.2.3 Receivals
6.4.1	Does the site have a written raw material quality control program?	7.1.1 Sampling & Testing
6.4.2	Does this program call for raw materials to be sampled and tested to ensure they comply with purchase contract and standard specifications?	7.1.2 Sampling & Testing
6.4.3	Are suitably trained and experienced employees assigned the task of receiving raw materials?	Removed 6.2.3 (Receivals) 3.2.7 Training
6.4.4	Are they authorised to accept or reject raw material deliveries?	3.2.7 Training
6.4.5	Are appropriate tests conducted when receiving raw materials (grains, soft meals, liquids, packaged materials)?	6.2.5 Receivals
6.4.6	Are retention samples of bulk raw materials taken and retained for at least three months?	7.2.1 Retention Samples
6.4.7	Are retention samples of packaged raw materials taken and retained for at least three months?	7.2.2 Retention Samples
6.4.8	Are retention samples identified or labelled to allow trace back to individual deliveries?	7.2.1 Retention Samples 7.2.2 Retention Samples
6.4.9	Are all received packaged raw materials adequately labelled (including ruminant feed warning statement) and in sound condition when received?	6.2.4 Receivals
6.4.10	Are labelling and packaging materials assessed for quality before use?	8.2.4 Manufacturing
6.5	Are raw materials found to be outside specification clearly identified and appropriately dealt with by authorised personnel?	6.2.6 Receivals
<b>7.</b>	<b>RAW MATERIAL - STORAGE</b>	
7.1.	Are storage areas designed and maintained to prevent damage to, contamination, unintended mixing, or spoilage of ingredients and packaging materials?	2.3.1 Storage
7.2.1	Are storage bins, silos, tanks and storage areas clearly identified with labels or numbers?	2.3.2 Storage
7.2.2	Is there written documentation of contents within storage facilities?	2.3.3 Storage
7.3	Is there an inspection and maintenance program for storage silos, bins, tanks and sheds which prevents raw material quality being compromised?	2.3.5 Storage
7.4.1	Are all packaged raw materials stored adequately, allowing separation of different raw materials?	2.3.7 Storage

7.4.2	Is a documented first in first out stock rotation in practice?	2.3.6 Storage
7.5.1	Are storage areas clean and tidy and have steps been taken to minimise vermin and bird presence?	2.8.2 Pest Control
7.5.2	Is RAM stored in designated bins or storage areas?	2.10.4 RAM
7.6.1	Are feed additives and medications clearly identified and stored in accordance with labels and regulations?	2.9.1 Medications & Chemicals
7.6.2	Is this area adequately secure to prevent cross contamination or inappropriate handling?	2.9.2 Medications & Chemicals
7.6.3	Are S4 medications kept in a locked secure area?	2.9.3 Medications & Chemicals
7.7.1	Are chemical treatments (e.g. fumigants, pesticides) applied as per label instructions to stored raw materials?	2.9.9 Medications & Chemicals
7.7.2	Are the personnel who apply these chemicals trained and experienced in their use?	3.2.9 Training
<b>8.</b>	<b>PRODUCTS/AGENTS NOT FOR INCORPORATION IN FEED - STORAGE, HANDLING AND USE</b>	
8.1.1	Are hazardous materials such as baits for pest control, boiler water treatment, fuel and cleaning agents stored securely away from ingredient handling areas to ensure that mistaken use in feed does not occur?	2.9.10 Medications & Chemicals
8.1.2	Are such materials stored close to the point of intended use where relevant?	2.9.10 Medications & Chemicals
8.2	Are all pest control chemicals used by suitably trained personnel and registered for such use?	3.2.9 Training
8.3.1	Are cleaning agents stored in a secure storage area and their use controlled?	2.9.9 Medications & Chemicals
8.3.2	Is there a record of what cleaning agents are kept on site?	2.9.9 Medications & Chemicals
8.4	Is there a written inventory control system for all non-raw material chemicals used on site?	2.9.8 Medications & Chemicals
8.5	Are all non-ingredient materials managed to ensure they are not mistakenly incorporated into stockfeed?	2.9.7 Medications & Chemicals
<b>9.</b>	<b>FORMULATION AND MANUFACTURING INSTRUCTIONS</b>	
9.1.1	Is there a written formulation master file, with a record of the dates of use and version numbers?	4.1.1 Formulations
9.1.2	Is this master file maintained by an authorised person?	4.1.2 Formulations
9.2.1	Do formulas in use provide the following information? <ul style="list-style-type: none"> <li>the name and unique identity code of the product.</li> <li>an indication as to the animal type for which the product is intended to be fed.</li> <li>the precise quantity of each raw material and, where appropriate, the location of the bin or bags of that raw material?</li> </ul>	4.1.3 Formulations
9.2.2	In mills where restricted animal material is used and ruminant feed is also manufactured, is there a system to identify formulations contain restricted animal material and is unsuitable for ruminant feeding?	2.10.6 RAM
9.3.1	When formulations are modified, including raw material substitutions, does an authorised person make such modifications?	4.1.4 Formulations
9.3.2	Is there a system to document formulation changes when they are made?	4.1.5 Formulations

9.4.1	Is there a written procedure adopted to prevent cross contamination of feeds with incompatible feed ingredients and medications?	2.6.1 Cross Contamination Control
9.4.2	Have these procedures been verified through inspection, sampling and testing?	8.1.2 Validations
9.5	Are precautions taken to prevent cross contamination of subsequent mixes; this may include records of flushing, sequencing and cleaning?	2.6.2 Cross Contamination Control
9.6	Is there a procedure for labelling, storage and handling of reworks and returns?	8.4.1 Reworks
9.6.1	Is there identification and disposal of classified waste products and are these labelled and segregated from raw materials and finished products?	8.4.2 Reworks
9.6.2	Are reworks and returns appropriately labelled and segregated?	8.4.1 Reworks
9.6.3	Are reworks and returns containing RAM or assumed to contain RAM clearly identified as such and are only reprocessed into non-ruminant feeds?	2.10.7 RAM
9.6.4	Is there approval for reworks release and reformulation by an authorised person?	8.4.3 Reworks
9.6.5	Is there a documented procedure for treatment of returns and reformulation into feed?	4.1.6 Formulations
<b>10.</b>	<b>PRODUCTION</b>	
10.1.1	Are there written work instructions for the critical manufacturing process jobs?	8.2.1 Manufacturing
10.1.2	Is there a record of what is manufactured and is this also used to confirm any departure from the defined production procedure?	8.2.2 Manufacturing
10.1.3	Are work instructions and manufacturing procedures regularly reviewed to ensure they remain effective?	4.2.3 Records
10.2.1	Are veterinary chemical products in use registered by the APVMA?	2.9.4 Medications & Chemicals
10.2.2	Are veterinary chemical products used according to label instructions or veterinary prescription?	2.9.5 Medications & Chemicals
10.3	Are veterinary chemical instructions (prescriptions) provided by veterinarians kept on record?	2.9.6 Medications & Chemicals
10.4	Are feed batching records kept which confirm that feed was manufactured according to formulation?	8.2.3 Manufacturing
10.5	Are there defined raw material weighing tolerances and are these monitored?	8.2.5 Manufacturing
10.6	Are there records confirming the mixer has been tested for mixing efficiency in the last 12 months?	8.1.1 Validations
10.7	Are production and batching records kept and retained for at least twelve months?	4.2.1 Records
10.8.1	Are out-loading and packaging systems, including all fixed or mobile silos, bins and tanks, designed and operated to maintain separation and integrity of finished products?	8.2.6 & 8.2.7 Manufacturing
10.8.2	Are bins identified by labelling or numbering systems?	2.3.2 Manufacturing
10.8.3	Are stored finished products clearly identified by records of what is stored in each silo, bin, tank or storage area?	2.3.3 Storage
10.8.4	Are storage silos, bins, tanks and sheds adequately designed, cleaned and maintained so that finished product quality is not compromised?	2.3.4 Storage
10.9	Are clearly labelled samples taken of all finished product bulk loads and packaged product runs, and retained for at least three months?	7.2.3 Retention Samples

10.10	Is the person who performs the on-site functions of production manager/supervisor appropriately trained?	3.2.3 Training
<b>11.</b>	<b>LABELLING AND STORAGE OF BAGGED PRODUCT</b>	
11.1	Are bagged finished products correctly packaged and labelled at the time of bagging?	8.2.7 Manufacturing
11.2	Are there defined finished product weighing tolerances and are these monitored?	8.2.8 Manufacturing
11.3	Do bag labels in use meet regulatory requirements, with specific reference to the restricted animal feeding ban?	4.3.1 Specifications
11.4	Is there a system to define how to set use by date periods for finished products?	8.1.3 Validations
11.5	Is there a system of checking pallets prior to use to ensure they are in a clean and good physical condition and do not damage packaged products?	8.2.9 Manufacturing
11.6	Are bagged products stored in a manner that does not cause product damage and enables clear identification?	2.3.8 Storage
11.7	Are broken or damaged bags of finished product segregated and dealt with to ensure they are not supplied to clients?	8.3.1 Non-conformances
<b>12.</b>	<b>LABELLING OF PRODUCT SOLD IN BULK</b>	
12.1	Does bulk delivery and/or invoice documentation meet regulatory requirements, with specific reference to the restricted animal feeding ban?	9.3.1 Bulk Delivery
<b>13.</b>	<b>LOADING, TRANSPORT AND DELIVERY</b>	
13.1	Are there loading and delivery procedures for bulk and bagged products which ensures loading of delivery vehicles with the correct product, without risk of damage, unintended mixing or contamination?	9.1.1 Loading
13.2.1	Is there a formal system of allocating finished product orders to out-loading bins and delivery vehicles?	9.1.2 Loading
13.2.2	Are all out-loading bins, transport vehicles and their compartments clearly identified through a labelling or numbering system?	9.1.3 Loading
13.2.3	Are bulk vehicles which have carried feed containing restricted animal materials cleaned prior to loading ruminant feeds?	9.3.3 Bulk Delivery
13.2.4	Are delivery vehicles inspected prior to loading to ensure they do not contain feed residues which can contaminate subsequent deliveries? If residues are found are cleaning procedures in place?	9.3.2 Bulk Delivery
13.2.5	Where external third-party vehicles are loaded, is confirmation of what the previous load carried obtained?	9.3.3 Bulk Delivery
13.3.1	Are delivery vehicles kept in clean, well maintained and roadworthy condition, and designed such that feeds can be kept dry and protected from contamination during transport and delivery?	9.2.1 Transport
13.3.2	Are bulk and bagged product transport vehicle loads covered during delivery?	9.2.2 Transport
13.3.3	Are documents provided to transport drivers to identify the feed products in a given load (by compartment as applicable) and clear instructions as to the precise destination for delivery of each product?	9.3.5 Bulk Delivery
13.3.4	If delivery vehicles are involved in any incident (e.g. accident) which could result in feed contamination, is there a system for reporting and determining the resulting actions regarding subsequent product delivery, return or disposal?	9.2.3 Transport
13.4.1	Are feed clients reminded of their responsibility to provide adequate, safe and unobstructed facilities for unloading, and the clear and visible identification of all their storage facilities (silos, bins, etc.)	9.3.6 Bulk Delivery

13.4.2	Are bulk feed products delivered into correctly identified farm storage facilities?	9.3.7 Bulk Delivery
13.4.3	Product is not unloaded into alternative facilities unless specifically permitted by the recipient and documented?	9.3.8 Bulk Delivery
13.4.4	Is any significant spillage reported to the mill site and the customer, and the spilt feed disposed of?	9.3.10 Bulk Delivery
13.4.5	Do drivers inspect truck compartments to ensure complete emptying and report/record instances of incomplete unloading?	9.3.9 Bulk Delivery
13.4.6	Is there a system to co-ordinate delivery vehicle movements in the event of a notifiable or emergency disease outbreak in the area within which feed is delivered?	11.1.1 Biosecurity
13.4.7	Are customer quarantine/biosecurity measures known and adhered to by the mill and drivers?	11.1.2 Biosecurity
<b>14.</b>	<b>INSPECTION, SAMPLING AND TESTING AND VENDOR DECLARATIONS</b>	
14.1	Are relevant mill staff aware of the requirement to allow access to state authorities to obtain samples for auditing of the BSE ruminant feed ban?	3.1.3 Job Descriptions & Org Chart
14.2.1	Is sampling of finished products conducted so that samples are sealed, separated, labelled and retained to allow easy retrieval?	7.2.3 Retention Samples
14.2.2	Are feed samples stored in appropriate conditions and can samples be easily retrieved?	7.2.4 Retention Samples
14.3.1	If samples are tested on site, are staff responsible appropriately trained and equipped?	7.1.3 Sampling & Testing 3.2.8 Training
14.3.2	Where samples are tested off site, is this conducted at a reputable external laboratory?	7.1.4 Sampling & Testing
14.4.1	Are inspection results and tests assessed against documented tolerance/standards and records maintained?	7.1.5 Sampling & Testing
14.4.2	Is there a method of investigation and corrective action when results are outside tolerance/standard?	8.3.2 Non-conformances 10.2.1 Corrective Actions
14.4.3	Are stock food vendor declarations provided when requested by customers?	7.3.1 Vendor Declarations
<b>15.</b>	<b>RECORDS</b>	
15.1.1	Are records kept to allow finished product trace back for a period of at least twelve months?	4.2.1 Records
15.1.2	Do these records include at least raw material source and storage, production batching, product quality test results and delivery details for all packaged and bulk feeds?	4.2.2 Records
15.1.3	Are records of verification results for flushing and sequencing kept?	4.2.4 Records
<b>16.</b>	<b>CUSTOMER COMPLAINT INVESTIGATION</b>	
16.1	Is there a written customer complaint procedure for registering and investigating problems?	10.1.1 Customer Complaints
16.2	Is there a record of timely resolution of complaints and identification of non-conformances which leads to corrective actions?	10.1.2 Customer Complaints
<b>17.</b>	<b>PRODUCT RECALL SYSTEM</b>	
17.1.	Is there a site Recall Committee with clearly defined members and documented responsibilities?	10.3.3 Recalls
17.2.	Is there a written product recall procedure which is linked to the customer complaint procedure?	10.3.1 Recalls
17.3.	Does the recall procedure call for: prompt retrieval of hazardous products from the marketplace, notification of relevant government authorities and minimisation of disruption to end-users of products?	10.3.5 Recalls
17.4.	Does the recall system apply in other circumstances (e.g. product found to be out of specification), not just customer complaints?	10.3.2 Recalls



17.5.	Does the recall procedure specify methods to identify, locate and control recalled product and to isolate recalled product on return to the mill?	10.3.6 Recalls
17.6.	Does the recall procedure include emergency and out of hours contact persons and telephone numbers?	10.3.4 Recalls
17.7.	Is the recall system periodically reviewed/tested for its effectiveness?	10.3.9 Recalls
17.8.1	Is each recall incident documented and reviewed to ensure procedures were adequate?	10.3.7 Recalls
17.8.2	Are mill practices and procedures reviewed to prevent recurrence?	10.3.8 Recalls