

NNABIZO KFT.
Cím: 1204 Budapest, Versec u. 9.
Cégjegyzékszám: 01-09-272339
Adószám: 22741444-2-43



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INTERNAL AUDIT – 2021

- A PREPARATION FOR GAFTA'S ANNUAL AUDIT -
[NNABIZO KFT, Budapest]

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Title:	Internal Audit
Company under audit:	NNABIZO Kft. 1204 Budapest, Versec u. 9.
Date of Internal Audit:	5 October 2021
Internal Audit Done By:	Szelekovszky Péter occupational safety engineer
Company Representative:	Mr. Zoltan Nabradi (fumigator)
Next Scheduled Internal Audit	September 2022

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Szelekovszky Péter

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Nábrádi Zoltán [NNABIZO Kft.]

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Introduction

The fumigation operation of NNABIZO Kft. is annually audited by the Grain and Feed Trade Association (GAFTA). Starting from 2021, Gafta has a new requirement of doing Internal Audits for all licensed fumigators. Since Nnabizo Kft. is a small family owned company, the internal audit process is a good opportunity for them to prepare for Gafta's third party audit.

SCHEDULE: This Internal Audit process will take place annually, before Gafta's audit.

SCOPE: The scope of the Internal Audit is to review Gafta's key requirements, highlights possible non-conformances.

RESPONSIBILITY: It is the company director's responsibility to review the internal audit's results and do the corrective actions within 2 weeks.

In the following audit spreadsheet, the following signs will show the audit results.

-  requirement met
-  requirement met – with comments
-  non-conformance
-  does not apply

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#	Key Requirement	Evidence	Result	Non-conformance Reason	Corrective Actions
1.	General Obligations and Requirements				
1.1.1	The fumigator must be a legal entity, or a defined part of a legal entity, which is legally responsible for its fumigation activities.	Scanned company extract about the Ltd.	✓		
1.1.3	For a multinational Fumigation company with offices in different countries, each country must hold its own certification to the Gafta Standard and be audited separately.		—		
1.1.4	The Fumigator must have documented operating and management procedures.	Documented in: “operating and management procedures”	✓		

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1.1.5	Fumigators must regularly (at least annually) review their management system to ensure continued conformance with procedures and policies, fulfilment of objectives, and identify opportunities for improvement. In particular a management review must consider (but is not limited to): Internal or external changes relevant to the scope of this Standard Suitability of operating and management procedures Outcomes of internal audits, audits against this Standard and any other external/third party audits Complaints, customer and personnel feedback Risk Assessments Corrective actions, and effectiveness of preventative actions/improvements.	Documented in: "Management Review"	✓		

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1.2	Outlined in this manual are the main areas of importance with respect to fumigation matters relating to combinable crops and animal feed materials and must be read in conjunction with the following manuals/guide notes which address the individual requirements for particular logistical operation/ procedures. Fumigators must demonstrate access to the latest version of each publication. • Gafta Fumigation Rules No.132 • Recommendations on the Safe Use of Pesticides in Ships applicable to the Fumigation of Cargo Holds • International Maritime Dangerous Goods (IMDG) – relevant sections • Fumigation product instructions, manufacturer guidance, product datasheets etc • All relevant local legislation and/or regulations.	The following documents are stored in the office: - Gafta Fumigation Standard V8 - Gafta No.132 Fumigation Rules - all material safety sheets and Hungarian permissions (with extensions where necessary) - a proper collection of all relevant Hungarian regulations	✓		

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1.3	Fumigators and ship owners and their representatives must comply with all the relevant requirements of the country and ports that vessels or cargo spaces are fumigated or ventilated in. For example, in USA ports to the requirements of the US Coastguard, in UK ports to the requirements of the UK Merchant Shipping Regulations and the UK Marine Coastguard Agency requirements, such as MGN284. In addition, any requirements of the country that the ship is flagged to must be adhered to.		—		
1.4	The fumigation products used must be applied strictly in accordance with the manufacturer's instructions, calibrations and safety precautions on the label, and records retained.	As per the fumigation reports and dosage calculations (based on material safety sheets), this criteria is always met.	✓		

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1.8	Fumigators must nominate a suitably experienced person as a Technical/File Manager who shall be the responsible person for receiving instructions from a 2.1 principal and who shall be responsible for forwarding the appropriate instructions to the Fumigator-in-Charge. The Technical/File Manager must be a permanent employee responsible for ensuring that sufficient information has been received to enable the Fumigator- in-Charge to satisfactorily carry out their duties.	Documented in fresh org chart document. As a small company, the Technical manager is the Director of the company.	✓		
1.10	A Fumigator must only contract out operations which it has been appointed to carry out to another Fumigation company certified under the Gafta Standard for Fumigation and/or from the Gafta Approved Register of Fumigators (excepting the recommendation in Section 14).	There are no sub-contractors of the company.	✓		

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2.	Complaints Procedure				
2.1	The Fumigator must have a documented procedure for handling complaints. This procedure must include systems for: • The prompt documentation and investigation of complaints • The prompt feedback to the complainant with findings • Deciding on internal actions required to prevent re-occurrence • Identifying trends and feeding into management review.	Documented in: - complaints log - complaints procedure	✓		
3.	Insurance				
3.1	Fumigators must demonstrate that they have adequate and appropriate insurance in place to cover any claims which may arise as a result of liability in respect of their operations.	Scanned Insurance Certificate [insured up to 50 million Forints]	✓		

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4.	Risk Assessment				
4.1	Fumigators must have a risk assessment in place that identifies and controls any hazards or risks that negatively impact their ability to carry out their services. Hazards and risks to the following must be considered: equipment, resources, personnel, confidentiality/information security, external influences, explosion, fire, food/feed safety, intoxication, personnel exposure and poisoning.	Documented in: - Risk Assessment [divided into 5 chapters] - HACCP manual - HACCP Plan - HACCP review log	✓		
5.	Internal Audit				
5.1	A documented internal auditing procedure must be in place, which reviews processes and verifies they are followed correctly and consistently and identifies opportunities for improvement.	The purpose of this document.	✓		

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5.7	The person responsible for overall control of the fumigation operations must ensure non-conformances raised through internal audit and any 3rd party audits (such as audits to this Standard) are rectified within specified timescales and implement suitable preventative action to avoid recurrence.	Added the time restriction of "Two weeks" to this document's introduction.	✓		
6.	Records and Record Keeping				
6.1	Internally produced records must be signed by the person carrying out the task or activity.	Documents are properly signed.	✓		
6.2	Records must be legible and kept in suitable conditions that allow ready retrieval and prevent deterioration.	Paper documents and online documents are kept in proper office conditions.	✓		
6.4	The Fumigator must only report actual and true findings.		✓		

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7.	Health and Safety Regulations for Employees				
7.1	The Fumigator must comply with all relevant local and national Health and Safety Regulations of the country in which it is operating with regard to its employees and any other operatives under its control.	Documented in: - Health and Safety Training - Medical Checkup Log / Scanned Papers	✓		
7.2	Fumigators must wear the appropriate Personal Protective Equipment. The items provided must be appropriate to the activities being performed, must be in good order and within any applicable validity period or expiry date. Records must be retained for the issuance and receipt of such equipment to/by Fumigators.	Documented in: - personal protective gear sign sheet	✓		
8.	Equipment				
8.1	Equipment must be fit for the purpose for which it is used and maintained and serviced to manufacturers' specifications or tolerances. Maintenance and servicing schedules must be recorded.	Documented in: - maintenance log - car cleaning log	✓		

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8.3	Equipment must be checked before use on a regular basis.	Documented in: "personal protective equipment - maintenance schedule"	✓		
8.4	Equipment must be calibrated where appropriate according to the manufacturers' instructions or in-house procedures, and records kept. Calibration adjustments must only be undertaken by authorised and trained personnel.	Documented in: - Calibration Log - Calibration Invoice for last calibration	✓		The "calibration report" document should be kept for next calibration.
9.	Training				
9.1	Competence: The Fumigation company must define and document (for example in a job description) the responsibilities and competency requirements for each employee, including (but not limited to) education, training, experience, technical knowledge and skills.	Documented in: "responsibilities and expectations"	✓		

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9.3	Fumigation technicians must be trained (or operating under a qualified technician) and licensed (or equivalent permit/document) to the requirements of the country where the fumigation or ventilation activities are conducted.	- scanned fumigator licenses - scanned pest control license - Detia Degesch Certificate for Mr. Zoltan Nabradi	✓		
9.4	Training programmes must be regular and updated as appropriate.	Documented in: "Company Training Programme and Logs"	✓		
9.5	Written training programmes must be implemented and include the following stages: • Induction period • Supervised/mentored working period with experienced operators Continued training to remain up to date with changing technology, methods, legislation etc.	See 9.4	✓		

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9.7	The requirement to attend or receive training must take into account the ability, experience and other qualifications held by each employee and shall be appropriate to their activities.	There are two roles in the company (fumigator, pest control) – this criteria is met properly during the trainings.	✓		
9.8	Regular performance reviews must be completed for all employees. This must be completed at least annually, but more frequently as required. Performance reviews must include a combination of on-site observations, interviews, self-assessment and other techniques to assess performance. Performance reviews must be used to identify training needs.	It is part of the Training Programme. See 9.4	✓		

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9.9	Training must cover at least, but not limited to, the following areas of activity: • All relevant codes and regulations including, but not limited to, those listed in Section 1 – General Obligations and Requirements • The requirements of the Gafta Standard for Fumigation • The applicable Gafta Contract terms and Gafta Rules • Health and Safety requirements • Fumigants and products used by the Fumigator		✓		
10.	– DOES NOT APPLY – In-transit Fumigation of Bulk and Bagged Cargo in Ships' Holds with Phosphine				
11.	– DOES NOT APPLY – In-Port Fumigation using Methyl Bromide or Sulfuryl Fluoride				
12.	– DOES NOT APPLY – Fumigation of Freight Containers				
13.	Store and Silo Fumigation				

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13.1	The Fumigator must carry out a safety assessment of the store/silo to be treated. This must consider potential areas of gas leakage, such as ducting on the floor or via the walls. A report of findings and any recommendations must be made in writing to all relevant parties. The recommendations made must have been performed prior to fumigation.	The results of Safety Assessment is recorded in the fumigation report. This document is filled in for every fumigation. <u>Further documents:</u> - fumigation report - fumigation unsealing report - work order	✓		
13.2	The Fumigator must ensure, using appropriate signage and security (locks etc), that the premises are declared out of bounds to personnel and public for the duration of the fumigation.	For each fumigation these signs are put on doors: - warning sticker - printed precautions	✓		
13.4	The Fumigator must ensure that the store/silo is clearly marked with appropriate warning signs stating the type of fumigant used and the date applied, and all other details as required by the relevant local authorities.	See: 13.2	✓		

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13.5	The Fumigator must ensure the agreed formulation of fumigant is used at the correct dosage to comply with the contractual requirements, and records retained. The Fumigator must advise the appropriate efficacy criteria in relation to the required minimum effective dosage, method of treatment and exposure time. Guidance criteria are available in a number of guide notes and handbooks. Other National Plant Protection Organisation requirements may apply. To ensure an even distribution of the fumigant in the commodity a powered circulation system is recommended.	It is part of the fumigaton report (see 13.1)	✓		
13.6	After the required exposure time, the Fumigator must safely ventilate and test the store/silo. The Fumigator can then issue a 'certificate confirming presence of harmful concentrations of fumigant is below Threshold Limit Value' (TLV).	It is part of the fumigaton unsealing report (see 13.1)	✓		
14.	– DOES NOT APPLY – Degassing/Venting during in-transit fumigation with phosphine				

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