



NSF HACCP Standard  
**Evaluation Site Report**

EVALUATION DETAILS

<b>Evaluation Details</b>				
Evaluator:	Evaluation Date:	Date of Previous Evaluation:		
Anil Kumar Mallisetty	02 <sup>nd</sup> April 2022	27 <sup>th</sup> Mar 2021		
Company Name: PENVER PRODUCTS LIMITED				
Address: DOOR NO.285, VODURU POST, PUNNAPARIVARIPALEM ROAD, ANDHRA PRADESH, Andhra Pradesh				
Postcode: 524410		Country: India		
Tel. No. +91 9100113309		Fax. No. -		
<b>Scope of HACCP Evaluation</b>				
Processing (de heading, peeling, cooking/blanching & Freezing) of Raw shrimps in Block & Individually Quick Frozen Forms and Cooked ready to eat in Individually Quick Frozen forms primarily packed in single / multilayer polythene bags.				
Exclusions: N/A				
<b>Key Personnel</b>				
Name/Job Title	Present at Evaluation ( ✓ )			
	Opening Meeting	HACCP Document Review	Factory assessment	Closing Meeting
Mr. R Ahamed / Operations Manager	X			X
Mr. G Rajesh / Factory Manager	X		X	X
Mr. A Suresh Kumar / QA Manager	X	X	X	X
Mr. K Prasad / Machinery incharge	X	X		X
Mr. G Mahesh / Shift Incharge	X	X		X
Mr. M Suresh / Purchase Incharge	X			X
Ms. T B Hepsiba / H R Manager	X	X	X	X



NSF HACCP Standard  
**Evaluation Site Report**

<b>Company Profile</b>				
<p>M/s. Penver Products Limited is a Govt. recognized Export House has been operational since 1995. The company has its processing plant constructed in 2015, at Door No: 258, Punnaparavari Road, Oduru Post, Chillakuru Mandal, S.P.S.R Nellore District, Andhra Pradesh -524 410, India. This village is about 150 Km away from Chennai airport. It is equipped with 2 plate freezers having 18 MT per day capacity, 2 Raw IQF machines having 32 MT capacity per day and one cooker 11 MT capacity per day. The company employs about 1100 employees. They work in three shifts. The company has various government approvals from EIA, MPEDA etc. The seafood products are exported to USA, European Union, Canada, South Africa, Asia &amp; Middle East. The range of products includes raw and cooked shrimp in many forms and styles. Capacity of cold store is 1740 MT of finished products stored at -18° C. Penver products Ltd. also achieved BAP Certification. The Factory is a registered food business with the authorities such as:</p> <p>1. Marine products export development authority of India as an exporter – KL1/MT/199/08 Dt: 2020-01-29 Valid till 2023-02-06. 2. Marine products export development authority of India for Peeling Shed – TN1/PC/021/15 dated 2019-05-10 valid till 2021-10-08. 3. Marine products export development authority of India for Storage – TN1/SP/029/15 2019-05-10 valid till 2021-10-08 4. Marine products export development authority of India for processing – TN1/PP/024/15 2019-05-10 valid till 2021-10-08. 5. Export inspection authority of India- Approval number 1857 valid till 2021-10-10. 6. Factories License No. 42614, Registration No. 8625 issued by Inspector of Factories is on file. 7. FSSAI License Number – 10013021000667 Valid till Dt: 2023-04-16. 8. USFDA Registration: xxxx4210 Valid Till: 2021-12-31. 9. Pollution Control Board – N-284/APP/PCB/ZO-VJA/CFO/W&amp;A/2015-1266 Dt: 2016-09-28 valid till 2022-12-31.</p>				

**OVERVIEW OF PERFORMANCE**

<b>Section of Standard</b>
<p><b>Management responsibility:</b></p> <p>Top management demonstrated support and commitment to development and implementation of the quality, regulatory and food safety to comply with GMP and HACCP Codex Alimentarius Rev.4 by establishing food quality and safety policy and procedure to relevant functions and also in other related standards. The senior management of the company shows high commitment to the development and implementation of the Food safety and quality management system. They have approved and authorised to implement many systems like BRC and HACCP and have achieved and maintained certifications of these standards. The senior management are present at the opening and closing meetings of all audits. They actively take part in the management review conducted once in a year.</p> <p>The company's management has identified the HACCP team leader/ QA Manager Mr. A Suresh Kumar is the responsible and accountable person for management &amp; maintenance of the QMS by meeting and adhering to the BRC &amp; BAP standard requirements. The same is clearly specified in the responsibilities at Doc No. QMS/01 I01 Dt.2021-12-27.</p>



## NSF HACCP Standard Evaluation Site Report

### Prerequisite programmes

The company has documented prerequisite programme available and evidence of implementation of the same was available. The programme encompasses all areas including employee hygiene, factory hygiene, cleaning and disinfection, maintenance of plant and equipment, pest control, supplier control, glass and wood policy, prevention of cross contamination, storage, waste and sewage disposal, provision of utilities and construction and layout. Monitoring records for these PRP's were available and the monitoring frequencies adequate.

All water used on site is from deep bore well. Water used in food production areas is potable and complies with EU Directive 98/83/EC and tested bi annually as per 98/83/EC. Test reports reviewed for water report No. QEIC- W/19070022-001 Dt.2019- 08-05 chemical & microbiology parameters and for tube ice report No. QEIC-W/19070022-002 Dt.2019-08-05 (Microbiology Parameters) and flake ice QEIC-W/19070022-003 Dt.2019-08-05 for microbial parameters issued by SMS lab, chennai, Water tested once in six months 98/83/EC table A report reviewed for Ice Report No. TC- 619220000005529P Dt.2020-12-01 & water TC- 619220000005533P Dt.2020-12-01 issued by National Collateral Management Services Ltd, Chennai. Water and ice tested internally for microbiological parameters once in a week records reviewed Record for Register for Assessing Sanitary Standards of the Unit (FMT/SSR/105) Dt. 2021-03-20 and found satisfactory. Plumbing diagram Dt.2021-01-04 is on file, total numbers of taps are 87 Nos. during internal micro analysis all the taps were covered on rotational basis. The water treatment system basically consists of filtration, clarification, softening, RO and UV treatment before it is delivered to different points of utilization. The facility using steam for the cooked product and the steam has been tested for heavy metals and microbiological parameters based on risk assessment in external laboratory report reviewed Test Report No. CML/19-20/67494 Dt.2021.02.21 issued by Chennai Mettlex Lab Private Limited, Chennai.

The water treatment system basically consists of filtration, clarification, softening and chlorination before it is delivered to different points of utilization..

The recall procedure is documented in Recall Program / Crisis Management (SOP/76 I01 Dt. 2021-01-04). The facility is having a recall action team documented in SOP/76 I01 Dt.2021-01-04. The recall procedure is addressing responsibilities of Recall Action Team and contact details. The facility having an up to date list of contacts belongs to Recall Team Members, Suppliers, Customers and Certification body. The facility having the contact details for external laboratory and Certification Body is on file. The product recall procedure tested once in 6 months and last conducted on Dt. 2020-10-12. Raw Peeled Deveined Tail on Vannamei IQF Shrimp Size 16/20 Production Code: 0E20, Type of Packing 5 x 2 lbs, cases produced 30 cases shipped was found with mis labeling. To complete this mock recall, it took 2 hr. 30 min. Facility doesn't have any recalls and regulatory food safety non-conformity.

The procedure includes proper identification, storage, prevention of unauthorized usage or mixing with other products, and responsibility for management of recalled products.

The facility is maintained to high standards. Maintenance is carried out properly and outside area is properly paved. No puddles or muddy areas noticed during the site visit.

The walls and floor are maintained well in the facility. The doors, windows and working surfaces are maintained well. None of the processing equipment's noticed during the audit was made of wood or other materials which could contaminate food products.

All the machinery used in the plant were well maintained and in good repair. Equipment's used are from reputed brands with proper design and construction to minimize contamination. All the plastic baskets, crates used to carry the product are of food grade and certificates were on file. Food Grade certificate for lubricant used is also on file. All the equipment's and utensils are made of food grade material and all are well maintained.

Personal Protective Equipment's were provided as per the assigned tasks. Workers in processing area are provided with clean aprons, head gear, mask, disposable gloves, and clean boots.

Maintenance workers were provided with shock proof electrical gloves, welding glasses, ear plugs, helmets, ammonia masks etc. The change rooms and scrub rooms are provided before entry into the processing areas. Personnel from rest rooms and after using toilets need to pass through the change rooms and scrub rooms to change into the work wear and wash their hands and feet before entry into the production hall. The design and construction is effective. The processing and preprocessing areas properly segregated with dedicated change rooms.



## NSF HACCP Standard Evaluation Site Report

The company controls the purchasing processes and ensures that raw materials, packaging materials, ingredients and services conform to requirements of the company. This is documented in SOP for Raw Material Purchase in supplier approval, evaluation and monitoring documented in Procedure for Evaluation and Approval of Raw Head on Shrimp Farmers (SOP/027 I04 R08 Dt.2022-01-17). Supplier approval and performance monitoring is implemented either using questionnaires or supplier facility and systems audits. Supplier approval procedure includes raw material, packaging and ingredient suppliers. . Reviewed supplier audit records for Raw material Ms. CH C R, Reg. No. AP028050, Ananthavaram Village, Tangutur Mandal, Prakasam District, Andhra Pradesh Dt. 2021-04-28, for packaging material M/s. C C & C P L., Visakhapatnam supplier audit done on 2022-02-02 and also Reviewed Third part Food Safety Certification ISO 22000:2005 Certificate No. BN16085/15864 Dt.2020-12-31 valid till 2023-04-14 issued by BSCIC Certifications Private Limited, for pouches supply M/s PPP, Vishakhapatnam, Andhra Pradesh is approved through supplier audit done on 2022-02-06 Ref: FMT/QMS/052 and also Reviewed Third part Food Safety Certification ISO 22000:2005 Certificate No. BN14346/13885:1215 Dt.2020-12-18 valid till 2021-12-20 issued by BSCIC Certifications Private Limited and Ingredients like Phosphates and Non Phosphates supplied by A B C L, Thailand is approved by their third party food safety certification, reviewed third party Food Safety Certification SQF Food safety code of Manufacturing, Edition 8.1 Dt: 2021-03-01 and valid till 2022-04-01. Salt supplier approval is done on 2022-01-08 for S C T, Ongole. Approved suppliers list Raw material (FMT/SOP/058), ingredients (Doc No.13.0 I04 R08 Dt.2022-01-17 and packaging (Doc No.12.0 I04 R08 Dt.2022-01-17). In case of exceptions, Procedure defines the handling of exceptions by purchasing the material from GFSI certified facilities and/or by testing the materials before accepting the products as per the specification requirements only.



**NSF HACCP Standard**  
**Evaluation Site Report**

**Terms of reference & Scope of Study:**

Terms of reference and scope of study were defined in HACCP documents.  
The scope of HACCP manual is described in Doc No. SCO/01 I01 Dt.2021-12-27 of HACCP manual and it is addressing all the products that the plant is producing like Procurement processing and Export of Raw Shrimp in Block Frozen and Individually Quick Frozen Forms and Cooked shrimps in IQF forms. The scope includes all products, processes, description of products, intended uses and methods of distribution in addition to various other parameters.

**HACCP Team:**

HACCP was Reviewed on 2021-12-26. The food safety team is multidisciplinary. HACCP Team is led by Q A Manager and has an experience of more than 12 years in the seafood industry and he is undergone HACCP training, reviewed certificates, undergone external training on Seafood HACCP & US FDA Import Overview on 2016-05-05 to 2016-05-07 conducted by The Export Inspection Council of India & US FDA and other team members were trained internally by QA Manager on 2021-11-15. HACCP team includes representatives from Directors, Factory Manager, Maintenance & Refrigeration, Production Activities, Quality Assurance, Purchase and Storage. HACCP team was documented in HACCP Team/Food Safety Team (HTL/01 I01 Dt.2021-12-27).

**Product description and use**

Product Description: The product description documented in Product Description Cooked IQF Shrimps (HACCP/004 I01 Dt.2021-12-27 ) & Raw IQF Cephalopods (Cuttle Fish/Squid/Octopus) (HACCP/010 I01 Dt.2021-12-27 ). Litopenaeus vannamei farm raised shrimp with glaze water, salt and sodium tri poly phosphate cooked individually quick frozen packed in poly bag and then packed into corrugated master cartons. The product has a shelf life of 24 months stored under frozen (below -18°C) condition in plastic packaging. The facility is having proper allergen control procedures. The allergen handled on the sight is shrimp (Crustacean) & Molluscs. Allergens have been addressed in the hazard analysis and included in the HACCP plan. This is controlled by way of labelling checks. The source of information for conducting hazard analysis is through Codex Alimentarius HACCP principles, USFDA Fish and Fisheries Products Hazards and Controls Guidance, 4th edition, April 2011, European Union Food Safety Authority guidelines, Seafood Journals and customer requirements. The intended use for the raw product is to be cooked well before consumption same was documented in Intended Use of the Product Doc No. HACCP/004 I01 Dt.2021-12-27 & HACCP/010 I01 Dt.2021-12-27. The target consumer is general public of all age group vulnerable groups of the population like infants, elderly, except people allergic to crustaceans.

**Flow Diagrams:**

Description of Process flow: The flow diagram was documented in Process Flow Chart – Cooked Aquaculture (Doc No. HACCP/004 I01 Dt.2021-12-27) & Raw IQF Cephalopods (Cuttle Fish/Squid/Octopus) (HACCP/010 I01 Dt.2021-12-27). it includes Receiving of raw head on shrimp, washing, beheading, sorting/grading, peeling/deveining, washing/icing, soaking with additives, cooking, freezing, glazing/weighting/packing, metal detection, labelling, final packing in cartons, frozen storage and shipment. The flow diagram also includes the introduction of utilities, potential for process delay and other food contact materials (Packaging, water & ingredients). The onsite verification of flow diagram conducted by HACCP team was evident documented in on site confirmation Dt: 2021-12-17 (Doc No. Onsite/02 I02 Dt.2021-12-07). The frequency of conducting onsite verification of flow diagram is once in a year or any change in HACCP plan or operational activity.



NSF HACCP Standard  
**Evaluation Site Report**

**Hazard Analysis**

The company has provided hazard analysis by using the risk assessment (consider to likelihood of occurrence and severity) and using decision tree as per HACCP Codex Alimentarius Guidelines. Hazard analysis for all the steps identified in the flow chart has been done and consists of possible Biological, Chemical and Physical hazards. They have also identified quality hazards. Risk assessment has been done by the team. They have used various sources for the data on risk assessment and have also used their personal experience and available knowledge in the industry. The significant hazards identified by the facility are pathogens, aquaculture drugs/pesticides/Sulphites, heavy metals, foreign bodies specifically metal, labelling for allergen (crustaceans). The team has used a five-step decision tree to determine CCP's. The hazard analysis was conducted and documented in Hazard Analysis Work Sheet (HACCP/004 I01 Dt.2021-12-27 & HACCP/010 I01 Dt.2021-12-27 ). The CCP decision tree was documented in CCP Decision Tree (HACCP/004 I01 Dt.2021-12-27 & HACCP/010 I01 Dt.2021-12-27 ).

**Critical Control points**

The company has 3 HACCP plans. The HACCP team has identified 3 critical control points for Raw Shrimps and Cephalopods & 4 critical control points for Cooked Frozen Raw shrimp.

The justification of CCP documented in Justification and Validation of Critical Limits (HACCP/004 I01 Dt.2021-12-27 & HACCP/010 I01 Dt.2021-12-27 ). All CCP's were documented in HACCP Plan Form for Cooked IQF Shrimps (HACCP/004 I01 Dt.2021-01-04) & Raw IQF Cephalopods (Cuttle Fish/Squid/Octopus) (HACCP/010 I01 Dt.2021-12-27).

CCP1 Raw material receiving: for Shrimps - Supplier Guarantee Certificate stating no aquaculture drugs, pesticides, heavy metals and Sulphites used in farming. For Cephalopods - Supplier Guarantee Certificate stating type and date of catching, temperature during transit. The monitoring frequency is each batch of raw material received.

CCP2 Cooking Temperature: Under cooking of the product leading to survival of pathogenic the critical limits are Steam Temperature of the cabin and time in cooker to attain core temperature as per the CIFT Cooker Validation Chart. The cooker belt speed is 99+2°C and end product core temperature 72°C holding time 60 sec.

CCP3 Metal Detector: IQF line Fe – 1.5 mm, Non-Fe – 2.0 mm, SS – 2.5 mm. monitored before start up production every 30 min. and at the end of production.

CCP4 Labelling: Check for allergen declaration i.e., contains shrimp monitored labels from each lot of labels at receipt and during production every 30 min.



**NSF HACCP Standard**  
**Evaluation Site Report**

**Critical Limits**

The critical limits are as below;

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CCP4 Labelling: Check for allergen declaration i.e., contains shrimp monitored labels from each lot of labels at receipt and during production every 30 min.

**CCP Monitoring systems**

Responsibility for monitoring and record keeping is evident in the HACCP plans.

The CCPs identified are followed and implemented properly. Procedures are established for each CCP to manage the hazards. Responsibility for monitoring and record keeping is evident in the HACCP plans. Reviewed CCP records Suppliers Declaration Certificate confirming non-usage of Aquaculture Drugs & pesticides, Metal detectors are checked every 30 mins. Label checks done each lot of labels at receipt. Non-conforming product usually disposed following sign off by QA Manager. Reviewed CCP records Farmer Declaration for Antibiotics, Pesticides, Sulphite Residue and Heavy Metals (FMT/SOP/23) Mr. D J M R, Ankulapaturu, Chilakuru Manadal, Nellore District, Andhra Pradesh Farm Reg No. AP0012056 /002 NLR 31, Dt.2021-03-27, Sulphite Test Results documented in CCP Chemical Analysis Report (FMT/CAR/26CCCP) Dt. 2021-03-27, Internal Antibiotic Reports (DOC/IAB/048A) Dt. 2021-03-26, CCP Temperature Monitoring Record for Cooking/Blanching (FMT/TMRCCP/39) Dt. 2021-03-27, CCP Monitoring Record – Metal Detector (FMT/MDCCP/35) Dt. 2021-03-27, CCP Monitoring – Packing and Labelling Record (FMT/PL/37) Dt. 2021-03-27. Raw material Test Certificate for Sulphites, Antibiotics, Heavy Metals and Pesticides Report No. CG21-000381.001 Dt. 2021-01-09 for Headon Shrimps supplied by Mr. M H, Thippagutapalem, Chillakuru, Nellore District – AP0003895/NLR27 (001).

**Corrective Action Plan**

In case of out of control for CCPs, the company will decide to reject. The procedure for control of non-conforming product was documented in Non-Conforming Product (SOP/61 I01 Dt.2020-01.04. The staff understands the procedures and designated areas for non-conforming product are clearly identified. Reviewed Non-Conformity Report (FMT/NCR/65) Dt. 2021-03-21 related to Vannamei Peeled Deveined Tail off Shrimp IQF production Code 1C07/NLR46 Size 31/40 packing 5 X 32 Oz due to short weight. Details of root cause analysis, corrective action and preventive action is recorded. The Quality Manager is responsible for use or disposal of nonconforming product. The staff understands the procedures and designated areas for non-conforming product are clearly identified.



NSF HACCP Standard  
**Evaluation Site Report**

**Verification**

The company has provided verification procedure. The facility was conducting traceability test once in a month one forward and one backward. Forward traceability is from farm to customer and backward traceability customer to farm. Last traceability test (FMT/PTR/001) was conducted on 2021-02-20. During the audit The auditor selected 0L20/ AP0038925 produced on 2020-11-20, vide invoice number :PEN/G/21/00292 Dt: 2020-01-28, 24 x 12 oz, Size: 100/150. Total No. of Cases - 1850 M/c. Raw material is supplied by R. Gopal Krishna, Vaddevolu, SPSR Nellore District, Andhra Pradesh, Raw material Qty - 12429 kg and Finished products is 7060.44kg., 56.78%% yield was achieved. CCP records were verified. Packaging Material by coromandel cartons and container pvt Ltd, lot number 5121232520 for Master cartons and Lot number :10202022 for Printed poly supplied by PPP, Phosphate lot No: 182232166 Supplied by Budheim and 2% and salt lot no: 1218 supplied by K A and used 2% shipped to CPFP, USA . Total yield is 56,78 % and the facility was able to trace 100% of the product within 2 hours. (11:30 AM to 01.30 PM on third day of the audit.).

The company has an internal audit system documented SOP/IA/052 I03 R05 Dt: 2021-01-09 and the internal audits are conducted by trained independent auditors based on internal audit schedule 2020-21 with frequency based on risk. Internal audits are conducted by cross functional team heads. All the internal auditors are trained in inhouse by HACCP team leader who is trained in external training for Internal auditor on 2016-04-07, Training certificates are filed and available for verification. The Internal audits are conducted through the year. and the complete system is audited at least once a year. The last audit was done on Food safety program on 2021-02-24 & HACCP on 2021-02-07. Audit done on sanitation control program on 2020-11-07 both conformity and Non-Conformity details are available for verification. Nonconformities are informed to section Managers and same were reviewed during the management review meeting conducted annually. The conformities raised during the internal audit were closed properly. In addition to the internal audit facility, monthly audits for cGMP verification regarding building fabrications are conducting and last done on 2021-02-04. Daily sanitation and Hygiene monitoring covering infrastructure like floors, walls, ceiling, etc are recorded dated 2021-03-05.

calibration of process control and measurement instrumentation and product sampling plan is available. Plant is in compliance with the product sampling program. Records of third party laboratory testing of finished product and on-going testing products for bacterial pathogens and banned antibiotics as per customer requirements are available and updated. Reviewed External lab test report for raw materials - Raw material Test Certificate for Sulphites, Antibiotics, Heavy metals and Pesticides Report No. No. CG21-000381.001 Dt. 2021-01-09 for Headon Shrimps supplied by Mr. M H, Thippagutapalem, Chillakuru, Nellore District - AP0003895/NLR27 (001).

**Documentation and records**





**NSF HACCP Standard**  
**Evaluation Site Report**

The company has provided documents and records for Prerequisite Program (GMP) and HACCP with very well maintenance. CCP records reviewed as below; CCP's were monitored every batch. Suppliers Declaration Certificate confirming non-usage of Aquaculture Drugs & pesticides, Metal detectors are checked every 30 mins. Label checks done each lot of labels at receipt. Non-conforming product usually disposed following sign off by QA Manager. Reviewed CCP records Farmer Declaration for Antibiotics, Pesticides, Sulphite Residue and Heavy Metals (FMT/SOP/23) Mr. D J M R, Ankulapaturu, Chilakuru Manadal, Nellore District, Andhra Pradesh Farm Reg No. AP0012056 /002 NLR 31, Dt.2021-03-27, Sulphite Test Results documented in CCP Chemical Analysis Report (FMT/CAR/26CCCP) Dt. 2021-03-27, Internal Antibiotic Reports (DOC/IAB/048A) Dt. 2021-03-26, CCP Temperature Monitoring Record for Cooking/Blanching (FMT/TMRCCP/39) Dt. 2021-03-27, CCP Monitoring Record – Metal Detector (FMT/MDCCP/35) Dt. 2021-03-27, CCP Monitoring – Packing and Labelling Record (FMT/PL/37) Dt. 2021-03-27. Raw material Test Certificate for Sulphites, Antibiotics, Heavy Metals and Pesticides Report No. CG21-000381.001 Dt. 2021-01-09 for Headon Shrimps supplied by Mr. M H, Thippagutapalem, Chillakuru, Nellore District – AP0003895/NLR27 (001).



NSF HACCP Standard  
**Evaluation Site Report**  
NON-CONFORMITY SUMMARY SHEET

Company: PENVER PRODUCTS LIMITED	Location: Gudur, Andhra Pradesh	Date of Evaluation: 02 <sup>nd</sup> Apr 2022
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**List of Non Conformities**

Ref No.	Detail of Non-Conformity	Corrective Action Timescale
	<b>Critical</b>	
	None	
	<b>Major</b>	
	None	
	<b>Minor</b>	
	None	

	Signed	Date
On behalf of supplier	Mr. A Suresh Kumar	02 <sup>nd</sup> April 2022
Evaluator	Anil Mallisetty	02 <sup>nd</sup> April 2022