

# Audit Report

Global Standard for Food Safety Issue 8: August 2018

1. Audit Summary			
Company name	<b>The Amalgamated Sugar Company LLC</b>	Site Code	8747948
Site name	<b>The Amalgamated Sugar Company LLC</b>		
Scope of audit	Production of light and dark brown sugar packaged into bags and granulated sugar packed into totes, bulk railcars and trucks.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Finish Date	2019-10-10		
Re-audit due date	2020-10-09		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
Choose a module	Choose an item		
Choose a module	Choose an item		

Head Office	No
-------------	----

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced
Previous audit grade	Choose an item		Previous audit date	Select a date	
Certificate issue date	2019-11-22		Certificate expiry date	2020-11-20	

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	3

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
F834 English Food Template v5 6th August 2019	Page 1 of 21	Report No. US/F6A / 614116	Auditor: Mark Bacola

3. Company Details			
Address	105 East Main Nyssa, Oregon 97913		
Country	United States of America	Site Telephone Number	+2083836594
Commercial representative Name	Kelly Malone	Email	kmalone@amalsugar.com
Technical representative Name	Lacey Messing	Email	lmessing@amalsugar.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3
Shift Pattern	2 shifts, 10 hours per day, 5 days per week. 7 AM-5 PM; 5 PM-3 AM				
Subcontracted processes	No				
Other certificates held	Kosher				
Regions exported to	North America Choose a region Choose a region Choose a region Choose a region Choose a region				
Company registration number	17674820784				
Major changes since last BRC audit	Initial Audit				
<b>Company Description</b>  Part of the Amalgamated Sugar Coop., this facility was built in the 1939 with additions and now is 6,039 sq. mts. The facility was a sugar mill but now only receives granulated sugar from Amalgamated sister facilities and produces light and dark brown sugar. A granulated sugar warehouse used for sugar storage. Sugar destined for brown sugar production is received mostly in bulk form and is stored in silos. Molasses is sprayed on milled sugar and packaged. All products are ambient stable with granulated sugar out-loaded into bulk tankers. The plant has 54 workers and operates 2 shifts 5 days per week but during the 3-month busy season, two 12-hour shifts, 6 days per week are operated. Approximately 5,499,200 lbs. of brown sugar is shipped per year.					

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
F834 English Food Template v5 6th August 2019	Page 1 of 21	Report No. US/F6A / 614116	Auditor: Mark Bacola

5.Product Characteristics					
Product categories		15 - Dried food and ingredients Category Category Category			
Finished product safety rationale		Low Aw-.59 light; .65 for dark, shelf stable			
High care	No	High risk	No	Ambient high care	No
Justification for area		Shelf stable product			
Allergens handled on site		None Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen			
Product claims made e.g. IP, organic		None			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Light and dark brown sugar packaged into plastic bags.			

6.Audit Duration Details			
On-site duration	16 man hours	Duration of production facility inspection	5 man hours
Reasons for deviation from typical or expected audit duration	Enclosed system, repetitive process		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1	2019-10-09	09-00	17-00
2	2019-10-10	09-00	17-00

	Auditor(s) number	Name	Role
Auditor Number	176376	Mark Bacola	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)				
	Name / Job Title	Opening Meeting	Site Inspection	Procedure Review
Bill Harden / Sugar Warehouse Supervisor	X	X	X	X
Lacy Messing / Food Safety & Quality Professional	X	X	X	X
Kelly Malone / Corp. QA Manager	X		X	X
Hillary Valdefero / Food Safety and Quality Professional (feed)	X	X	X	X

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
F834 English Food Template v5 6th August 2019	Page 1 of 21	Report No. US/F6A / 614116	Auditor: Mark Bacola

## Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Requirement ref.	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date

Major							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

Minor							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	3.6.4	Specifications are reviewed every 3 years, however, 50 lb. bag specs. were dated 2010, well over 3 years.	Corporate personnel were contacted to confirm the specification has not been changed during the BRC audit.	The corporate personnel identified the specification issued date and added reviewed date with initial. It has been discussed for 3 year verification.	Basic Safe Corrective Action: CA 2035 Packaging Specifications with issue date, reviewed date initials.	2019-10-27	MB

2	4.4.1	A gap around a pipe was observed in the NW corner of the bulk barn.	Alerted mechanics of the hole and to repair it immediately.	Added fiber glass sheets inside and outside of the bulk barn. Added silicone around the sheet metal and expanded foam to enclose the pipes.	Basic Safe Corrective Action: CA 2036	2019-10-27	MB
3	4.5.1	The site is now relying on the water purveyors test results and is not testing water for biological parameters per the standard annually, the last test result is dated 18/09/27. The site can use the purveyors test results for chemical attributes however.	Collected the water samples and submitted to Boise Analytical Laboratories, INC. The results came back absence.	Annually the water testing will be completed on the following 3 areas for drinking water testing.	Basic Safe Corrective Action: CA 2037 Attached: Water Results	2019-10-27	MB

<b>Comments on non-conformities</b>

# Detailed Audit Report

## 1. Senior management commitment

### 1.1 Senior management commitment and continual improvement

The company's senior management has demonstrated that they are committed to the implementation of the requirements of the Global Standard for Food Safety Issue 8. This includes the provision of adequate resources, effective communication, systems of review and actions taken to effect continual improvement. Opportunities for improvement have been identified, implemented and are fully documented. Continual Improvement Measures and Food Safety Objectives dated, 1.3, dated 19/04/08.

There is a documented Commitment to Food Safety and Quality, dated 19/04/18, which has been signed by the stakeholders and is displayed in multiple areas of the facility and is included within the staff QA hand book.

Clear 2019 objectives are set by the corporate office:

- Customer satisfaction/shipping accuracy, 3% reduction,
- 100% Complaint response
- 3rd party GFSI audit certification grade A or above.
- 80% completion of all records,
- <3% increase in food safety related incidents, i.e. breakdowns, pest issues, HACCP deviations.

If goals are not achieved than a root cause analysis shall be performed.

Customer complaints along with internal non-conformities are monitored on a monthly basis and discussed at their Monthly Management Meetings as well as quarterly corporate quality management meetings. Additional monthly toolbox meetings are held to involve employees in decision making and suggestions.

Work Instructions, Food Safety and Quality Culture Improvement, WHS-WI-006, dated 19/09/03, describe how quality culture is to be achieved and maintained along with methods to ensure effectiveness.

All goals were achieved for 2018.

Goals are also tracked and trended and presented during the annual meeting, monthly meetings and quarterly Management meetings goals are all close or surpassing goals set. The last annual meeting was held 19/10/01.

Monthly management meetings are conducted with the last on 19/09/23 which addressed all agenda items including any issues with the infrastructure, quality manual, KPIs, HACCP deviations, goals, damage, objective score cards, housekeeping and hygiene, food safety culture and last meeting status, etc.

A complaint/whistleblower 800 phone number has been instituted and employees have been informed of the method to make complaints or inform management of unsafe conditions or product.

The VP of Quality keeps site management apprised of changes to regulations and technical information. Management also gets regular emails from regulatory agencies and industry groups). Technical, Regulatory, and Industry Updates, 3.3, 18/07/05.



Various upper managers attended the audit and were involved in the process. This indicates a commitment to the quality and safety of the products supplied. The facility is professionally managed and is operated in accordance with all relevant food safety requirements.

BRC logo is not used

This is the initial audit, no non-conformities from last audit.

**1.2 Organisational structure, responsibilities and management authority**

The company has a clear organizational structure with defined responsibilities to ensure that the products manufactured are safe and meet regulatory requirements. The corporate and local organization chart is maintained and shows the management team and responsibilities including key job functions dated 17/08/10. The structure in the facility has 2 department heads with alternates to cover absence of key positions described.

Job descriptions for the positions on-site are present and were examined as part of the audit; all were found to be complete and accurate, Job Descriptions and Additional Food Safety Responsibilities, doc. 3.5-01, dated 19/04/26. Jobs reviewed were Warehouse Supervisor and Warehouse Manager.

**2 The Food Safety Plan – HACCP**

The HACCP Team includes the Warehouse Manager, Food Safety and Quality Professional (team Leader), Assist. Warehouse Supervisor, Warehouse Foreman, Warehouse Maintenance Lead and Quality Assurance Manager. The HACCP Team leader has 2 years with the company and is a PCQI along with HACCP training SAI Global dated 16/02. Training certificates are on file for the HACCP team from AIB and for PCQI trained personnel along with internal trainings conducted annually.

In addition, HACCP Team Members have between 5-32 years of experience in the food industry. The HACCP Team members appear to have a clear understanding of HACCP principles based on the responses provided during the audit when interviewed. HACCP Training for all employees is provided during the year using presentations.

The facility has documented pre-requisite programs such as sanitation, pest control, staff training, purchasing, GMPs, equipment PM, water testing program, complaint handling and facility GMP audits. Based on an inspection of the facility, it appears they have implemented the pre-requisite programs effectively.

The scope of the plan and all applicable criteria is well documented, Product. Reference materials on hand were appropriate for their industry. The intended use of the items addressing vulnerable groups of the population has been addressed.

Product uses are is for further processing by customers including bakeries, creameries and confectioners with the target market of food manufacturers. The potential for food safety issues is covered using GRAS Affirmation 21 CFR 184.1854. FDA Compliance policy guidelines 555.425, food adulteration involving hard or sharp materials. FDA Regulation on cGMP, Hazard Analysis and Risk Based Preventative Controls for Human Food, CFR 117.

Bulk sugar and syrup are received, inspected, metal detected and blown into the storage tanks. Sugar is then moved to a mixing tank where syrup is added, mixed and packaged. Metal detection is used prior to loading or packaging and these are considered a CCP. All granular sugar received by rail car or tanker truck is metal detected and stored for distribution or blending. Verification of the flow diagram was performed on 19/08/15.

Hazard analysis includes the evaluation of biological, chemical and physical risks using a decision tree; those identified as of concern were physical contaminants mainly in the form of metal. Risk assessments are documented for the raw materials and processing steps considering the probability and severity. CPG Sec. 555.425 Foods, Adulteration Involving Hard or Sharp Foreign Objects.

Radiological risks have been assessed. Codex decision tree used and documented in the HACCP Plan.

Based on the risk assessment, the only CCPs identified are Metal Detection, however, screens and magnets are also used.

CCP #1-Metal Detection: Critical Limits (Retail): 1.5 Fe, 1.8 NF, 2.0 SS and 2.0 AL.; Bulk Bags: 1.8 Fe, 2.0 Non-Fe, 2.5 SS and 2.0 Al. All shipped granulated and brown sugar product passes through an operating metal detector; functionality of metal detector was checked during audit. Corrective actions include putting the product on hold and evaluating.

The plant validates critical limits when changes occur, during historical data review and by using product non-conformances, calibrations and during the annual HACCP review meeting.

The HACCP plan is reviewed when changes are made to the process or reviewed on an annual basis as a minimum. The most current review dated 19/08/15 was noted as being completed on within the allotted timescale.

### 3. Food safety and quality management system

#### 3.1 Food safety and quality manual

The main Quality Management System with department specific work instructions are available on the company intranet with hard copies also available. Documents reviewed during the audit were noted to be legible, unambiguous and appropriately detailed to enable their correct application by the staff. The FSQM was available for review and has been fully implemented. Documents reviewed were legible and complete in the appropriate language English.

#### 3.2 Document Control

A system is in place to maintain the most current document version. Documents reviewed during the audit were noted to be legible, unambiguous, in appropriate languages and appropriately detailed to enable their correct application by the staff. Basicsafe is used as a database for documents and for other internal solutions such as CAs and Customer Complaints. Document Control: Creation, Approval and Implementation, doc. 2.1, 19/04/08.

Staff is trained in document control annually with the manual provided on the company intranet and hard copies. Within BasicSafe, an updated list of documents and forms is present.

#### 3.3 Record completion and maintenance

The Warehouse Supervisor is responsible for maintaining the documents and records with documents retained for 6 years; shelf life is generally granulated sugar 5 years and brown sugar 18 mo., Document Control: Creation, Approval and Implementation, Doc. 2.1, dated 19/04/08; Records: Completion and Retention, 2.2, 19/04/08.

#### 3.4 Internal audits

Audits are performed covering all aspects of the FSQM; Internal Auditing and Facility Inspections, doc. 8.3, dated 19/04/08. Auditor reviewed the records of internal audits performed 19/02/11; 19/05/07; 19/06/18 and 19/07/17. Aspects of all policies and procedures are reviewed during the audits.

The internal auditor has been trained externally in HACCP and Internal auditing dated 13/01/13 and is independent from the facility being audited. Procedures call for the internal audits to be performed throughout the year quarterly. GMP auditors are chosen based on experience and training and on-going food safety training, generally the Warehouse Supervisor conducts inspections.

Corrective actions for the internal audits are documented on the check sheet used for auditing. Follow-ups and conformation of corrective actions are noted on the Non-Conformity Database, BasicSafe.

Audits are performed monthly for sanitation and GMPs with documentation present for all inspections. Internal Audits and Facility Inspections, doc. 8.3, dated 19/04/08.

Auditor reviewed the audit reports for the plant inspections conducted 2019 YTD. The reports indicated corrective actions and confirmation of completion. In addition, daily and weekly pre-operational inspections are conducted in the various process areas to ensure that maintenance and cleaning conditions are appropriate. A pre-op inspection was examined and found to be complete.

### 3.5 Supplier and raw material approval and performance monitoring

#### 3.5.1 Management of suppliers of raw material and packaging

Documented corporate procedures based on a risk assessment for the acceptance and testing of raw and packaging materials are present. Processing syrups and sugar hazard analysis were examined and found to be complete. For Syrups dated 19/02/07 and for Sugar dated 19/02/07. All items are low risk including packaging materials.

There are documented corporate procedures for approving suppliers of goods and services which require a questionnaire to be filled out by the supplier and supplying a GMP or GFSI 3rd party audits if possible. On-going evaluation of each supplier is carried out based on risk but not less than every 3 years.

There are provisions for supplier exceptions in the Supplier Approval, doc. 5.1.17, dated 19/04/08 and describes that unapproved suppliers (spot purchases) are not allowed.

The following suppliers were reviewed:

- 1-Amalgamated sugar-Nampa, Twin Falls, ID, supplier of raw sugar from sister faculties, SQF certified.
- 2-International Molasses-Dayton, OH, supplier of syrup, BRC certified.
- 3-Hood Packaging-Vancouver, WA, SQF certified.

Raw material acceptance for the sugar, the ingredient traced in the vertical audit, was examined and found to be complete.

The followings are required for each packaging and raw material supplier:

- 1-GFSI or HACCP audit.
- 2-Letter of guarantee.
- 3-The supplier must fill out a questionnaire as well.

Traceability programs with suppliers are verified by GMP and GFSI audits for ingredients and packaging.

100% of the raw sugar are supplied by an Amalgamated Facility. Approved Supplier List is present with sugar and syrups and packaging.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

COAs and CLOGs are obtained for the ingredients that are used and all material are inspected and tested as required upon receipt. Dry Van Trailer and Container Shipments, doc. 5.2.12, 19/04/08, Incoming Materials Receiving Log, doc. 6.4-01 and Unloading Dry Van Trailers, 10.9.1-07, 15/05/18, Bulk Sugar Railcars, 5.1.10, dated 19/04/08 among other SOPs.

Raw material acceptance for the Sugar from Amalgamated, the ingredient traced in the vertical audit, was examined and found to be complete. Intra Company Shipment Policy dated Aug 6, 2015.

Inspections are conducted on all trucks when raw materials are received including seals. The information was reviewed for raw material and packaging materials included as part of the vertical audit with no issues noted.

3.5.3 Management of suppliers of services

Contracts and specifications for services are maintained. Contracts for the limited number of service providers were examined and found to be current and correct. Services are:

- Data Storage-BasicSafe
- Waste Removal-Ontario Sanitation
- Pest Control-Ecolab
- Laundry-Cintas
- Trucking-Handy Truck Lines

Exceptions to the service supplier approval program are not allowed.

3.5.4 Management of Out sourced processing

Nothing is outsourced.

3.6 Specifications

Raw material and packaging specifications include criteria against contaminants where applicable (microbiological, physical properties). Data sheets are provided in company format for finished product specifications. Specifications are available in BasicSafe and customer specifications are available in PRISM AS 400, Specifications Management and Product Formulation, doc. 6.1, dated 19/04/08.

Specifications were reviewed for raw materials (sugar), finished products (Light Brown Sugar) and packaging materials (50 lb. bags). All were found to be correct except as below.

3.6.4-MI-Specifications are reviewed every 3 years, however, 50 lb. bag specs. were dated 2010, well over 3 years.

Raw material specifications include Product Description, Product Specification, Relevant Analytical and Micro Specifications, Storage and Shelf Life.

3.7 Corrective and preventive actions

Corrections and Corrective/Preventative Actions & Root Cause Analysis, 1.4, dated 19/04/08 describes the methods for applying corrective actions. A computer aided program (BasicSafe) is used to follow and close out corrective actions.

Examples of completed CAPAs were available and reviewed during the audit. Corrective actions are recorded for product non-conformances, breakdowns and internal audits. regulatory actions, external audits and any other source.

The procedure describes the methods for collecting and analyzing data to determine the root cause, develop corrective actions, assign responsibility and to document the effectiveness of the corrective action taken.

A corrective action log is present in database.

**3.8 Control of non-conforming product**

Non-Conforming Product or Materials, Doc. 7.2, dated 19/04/08, describes the procedures for releasing product and controlling non-conforming product. The Warehouse Supervisor has the final authority for disposition.

Product is blocked from shipping by the computerized inventory control system. Appropriate procedures were noted followed and verified during the site inspection. All non-conforming products are identified using the appropriate tag and segregated if possible. Most non-conforming product is re-melted into new product.

All employees interviewed had a good understanding of the procedure to notify management in case of any non-conforming product or material.

**3.9 Traceability**

The traceability system operates through the computer system and with paperwork which enables the trace of raw materials and packaging from supplier through processes to packing and dispatch. Traceability, doc. 4.4, dated 19/04/08.

Most raw materials and all finished products are coded using a lot number consisting of 5 digits: 17069, where 17=year, 069=Julian date, N=Nyssa.

Approved suppliers have their traceability system confirmed via GFSI audit or by Mock Recall Exercises received and confirmed.

The facility conducts traceability exercises once per year with the last trace exercise performed 19/05/30 on 1 lb. bags received 19/5/30, 57 rolls. 100% of the bags were traced in 1 hr. 24 min. 17 rolls were remaining on-hand. The scenario was final product contamination.

A forward and backward traceability/mock recall exercise conducted during the audit was completed in 48 min. with 100% of the ingredient granulated Sugar from one of 3 Amalgamated plants and stored in silos. The finished product, Dark Brown Sugar, was produced 19/07/10, lot # 19191N, 240,000 lbs. with 100% recovered in 48 min. The scenario was a piece of metal in a 50 lb. bag.

Based on the records observed, the program is managed effectively. Records reviewed included truck inspections at the receiving of raw materials, weights and shipping information. No issues were noted.

**3.10 Complaint-handling**

A formal customer complaint program is present; complaints are forwarded from the corporate Customer Service Dept. to the QA and site managers. Complaint data is examined quarterly by the management team for trends. Customer Complaint Management, 1.6, dated 19/04/08. Smartsheet is used to track and complete complaint investigations.

There has been 1 complaint to date this year regarding foreign material. All complaints are all are tracked, trended and analyzed for significant trends and presented to Managers during Monthly Management Meetings.

**3.11 Management of incidents, product withdrawal and product recall**



The facility has a plan and system in place to effectively manage incidents including product withdrawal and recall procedures. The product recall and withdrawal procedure is tested bi-annually using different scenarios. Recall Program and Testing, 3.2, 19/04/08; Crisis Management, 1.7, 19/04/26; 3.8-01. Emergency Plan for Product, 3.8-01, 19/04/26. The corporate incident plan calls for the notification of the BRC certifying body in the event of an incident or withdrawal within 24 hours.

Regular documented incident testing is performed such as evacuation and fire. Contingency plans for the disruption of utilities, natural disasters and sabotage have been formulated and documented.

The facility conducts traceability exercises once per year with the last trace exercise performed 19/05/30 on 1 lb. bags received 19/5/30, 57 rolls. 100% of the bags were traced in 1 hr. 24 min. 17 rolls were remaining on-hand. The scenario was final product contamination.

A forward and backward traceability/mock recall exercise conducted during the audit was completed in 48 min. with 100% of the ingredient granulated Sugar from one of 3 Amalgamated plants and stored in silos. The finished product, Dark Brown Sugar, was produced 19/07/10, lot # 19191N, 240,000 lbs. with 100% recovered in 48 min. The scenario was a piece of metal in a 50 lb. bag.

A vertical approach was taken for the mock recall exercise with all pertinent documentation included with the mock recall.

There have been no actual recalls.

#### 4. Site standards

##### 4.1 External standards

The facility is located within an industrial area of Nyssa, OR. In general, the external areas of the facility are kept in acceptable condition. Access roads along with service roads around the facility are paved. No local activities that would risk product contamination were noted.

The building fabric is maintained to a good standard. Walls are made of appropriate materials, brick for the most part.

No active live-stock or farming industries are in the area which make the potential for sewage contamination from live animal waste low.

##### 4.2 Site security and food defence

All doors are kept closed and locked and opened only by using key cards with the facility being fully fenced with controlled access to the campus. A CCTV system is installed in the facility including internal areas. The facility is registered with the FDA under the Bioterrorism Act updated October 23, 2012. Sensitive areas have been defined as chemical storage at this facility.

A risk assessment is completed annually for the site based on US Department of Agriculture Requirements. The last assessment was dated 19/06/19. Measures observed in place were a fully fenced facility and a controlled truck gate, seals for the trucks in and out are used. All external tanks and pipes are secured when not in use. Food Defense Procedures, 9.1-01, dated 19/05/01 is on file.

Security inspections are conducted on a monthly basis along with the GMP inspections.

Food security training is provided to all employees annually.

Transport drivers are not allowed inside of the warehouse or facility, they must wait outside of the facility. In addition, a visitor program has been implemented where visitors must report at the front desk and sign a visitor log.

4.3 Layout, product flow and segregation

Based on the appendix 2 of the BRC Standard the facility is considered as a low risk site. An enclosed system is used for the process such as filling equipment, raw materials and finished product storage.

A site map is available including the low risk and enclosed product areas Nyssa Route Diagram, dated 19/03/18. In addition, another version of the site map was available including the access points, location of staff facilities and routes within the facility from places of work and production process flow dated 19/09/24.

Adequate space was observed between the line and equipment to allow for cleaning, inspection, maintenance and product cross contamination.

The segregation of the different areas in the facility is appropriate to prevent a potential contamination; segregated areas were observed for raw materials storage, packaging materials and mixing area, lunch room and toilets. Waste handling and storage is managed accordingly with no issues noted.

Contractors and visitors must sign the visitor log for the facility. General policies are posted and must be reviewed at entry including GMP practices required in processing and storage areas. All visitors must be escorted, and contractors are supervised during their stay in the facility.

Appropriate procedures have been implemented by the facility based on the low risk and enclosed products such as hand washing, smocks and hair nets.

4.3.9 No temporary structures were observed.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The facility has determined that there are no high-care or high-risk areas and no ambient high-care and the facility has been classified as a low risk operation as described on the site map available following the Appendix 2 of the BRC Standard. Enclosed areas are identified as the warehouse, production areas and shipping docks. Drainage is suitable for the facility and the operation. Windows were observed in the process area in doors and in good condition.

Doors in different areas in the facility were observed to be in good condition and pest proofed. Lighting observed in the facility was appropriate for the operation. Shatter proof lights were observed in place where exposed products are handled. Adequate ventilation is in place throughout the facility. In general, exhaust fans were observed in place and in good condition.

4.4.1-MI-A gap around a pipe was observed in the NW corner of the bulk barn.

Based on a risk assessment, filtered air is not required due to low risk/care.

4.5 Utilities – water, ice, air and other gases

Water is supplied by the City of Nyssa and is tested annually by the utility for pathogenic bacteria and chemical residue with the last test dated

4.5.1-MI-The site is now relying on the water purveyors test results and is not testing water for biological parameters per the standard annually, the last test result is dated 18/09/27. The site can use the purveyors test results for chemical attributes however.

Water is not used as an ingredient in the facility and is used only to wash/clean processing area and tools. Water is softened and filtered to 100 mesh on-site.

Backflow preventers are checked annually with the last 19/07/23.

Non-potable water is not used in the facility.

Compressed air or other gasses are not used. UV treated and filtered air is used for the headspace in syrup tanks. Filters are cleaned and examined per the MSS.

Reviewed Water Distribution Map dated 19/10/08 including back flow devices, filtration and softening.

#### 4.6 Equipment

Equipment observed in the facility such as tanks, pipes, among other items, were noted made of stainless steel or plastic in appropriate condition for the manufacture of food products. Maintenance and cleaning conditions of equipment and areas were appropriate. Equipment was appropriately sited for cleaning and inspection. Facility and Equipment Maintenance, 5.1.05, 19/04/08.

The main equipment in the facility is storage tanks, pipes and mixers.

#### 4.7 Maintenance

Preventive Maintenance Program is planned and accomplished using the computerized system (Basicsafe) following manufacturer recommendations, or on a risk-based system for older equipment. Facility and Equipment Maintenance, 10.5.1, dated 19/04/08.

Each maintenance work order provided includes a documented hand back, checking for the removal of tools and that hygiene standards are inspected. 10.5-01.0 Maintenance Log for Final Product Equipment.

Reviewed maintenance work order as part of the vertical audit. The information was complete and included reconciliation of tools and cleaning after maintenance activities. Food grade lubricants were observed in use in the facility with a known allergen status.

Temporary repairs are generally not permitted and their suitability in a food environment is determined on a case by case basis with labelling and logging of the repair required. Temporary repairs were not observed during the audit.

An inspection is completed after maintenance activities to ensure the area is cleaned and free of foreign material. Maintenance is performed during off production times and cleaning is performed as part of the normal daily activities and pre-production inspections.

The Warehouse Supervisor is required to sign-off the pre-operational check/hygiene inspections after service and before the equipment can be used in production. Maintenance Log for Final Product Equipment, 10.5-01.0.

There is a small maintenance shop segregated from processing.

#### 4.8 Staff facilities

Catering is not applicable to this facility. The facility provides a suitable designated area, outside of the processing and storage areas, where the employees can take a break.

A microwave and refrigerator are provided for employee use.. Centrally located restrooms are provided and maintained in clean condition, all hand washing stations in the restrooms and other designated areas



are properly fitted with single use towels and liquid soap. Bathrooms are segregated and do not open into processing areas. Policy 10.1.1 Personal Health, Hygiene, and Protective Clothing § 3.5.

Smoking is not permitted.

Auditor observed all workers wash their hands when returning to work from break using the wash stations. Food brought into the facility is appropriately stored in a clean and hygienic manner. Food and beverages are not allowed in the manufacturing areas

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Chemical control program in place for products used for cleaning and maintenance following the Chemical Control, 5.1.16, dated 19/04/08 on file and applicable for all possible chemicals that could be used in the facility. As a requirement, chemicals must be maintained inside of locked cabinets and must be properly labelled. No issues observed during the site inspection.

An approved Chemical Register was observed on file for cleaning chemicals and maintenance with MSDS sheets on file and current. Strongly scented products were not observed in use at the time of the audit. Secondary containers were observed properly identified.

4.9.2 Metal control

Foreign Matter Prevention: Glass, Plastic, Wood and Knives, 10.8.1 includes metal control.

Snap off blades not observed in use at the time of the audit. Ingredients with staples in packaging materials or closures are not allowed in the facility. Paper clips and staples are not allowed in the process area.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Physical Contaminate Prevention & Control, 5.1.08, dated 19/08/07 is used to control glass and other breakable materials including breakage procedures. There are no windows in the process area.

Glass audits are conducted monthly in the facility as part of the GMP inspection with documentation present with the last dated 19/09/02. In case of breakage, an Incident Investigation Report must be completed. Food Safety Quality Incident Report, 7.4-01.0. No breakages have been reported.

4.9.4 Products packed into glass or other brittle containers

Nothing is packed in glass or brittle containers.

4.9.5 Wood

Wood is used only for pallets for raw materials. Wood is not allowed in processing areas unless necessary. Pallets are inspected prior to use and no issues noted in the facility. New pallets are used.

4.9.6 Other physical contaminants

Packaging is controlled by an SOP.

Metal detectible pens are N/A.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Foreign material detection has been considered within the HACCP study with metal detectors used for detection.

4.10.2 Filters and sieves

Screens are used in various places in the process to control foreign material (1/4") and granulation control 28-56 mesh rotes screens are used. Screens are examined before each load and after each load.

Filters are used for syrups 100 mesh and are examined at the beginning of the shift.

4.10.3 Metal detectors and X-ray equipment

A metal detector is used on all packaging lines. Metal detectors was challenged during the audit and were found to be working correctly.

If metal is detected, the line stops with a visual alarm..

CCP #1-Metal Detection: Critical Limits (Retail): 1.5 Fe, 1.8 NF, 2.0 SS and 2.0 AL.; Bulk Bags: 1.8 Fe, 2.0 Non-Fe, 2.5 SS and 2.0 Al. All shipped granulated and brown sugar product passes through an operating metal detector; functionality of metal detector was checked during audit. Corrective actions include putting the product on hold and evaluating.

X-Ray is not used.

4.10.4 Magnets

Magnets are located before the metal detector and at various points in the process. Magnets are checked before and after each load. Pull tests are carried out annually.

4.10.5 Optical sorting equipment

Not used.

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

Not required.

4.11 Housekeeping and hygiene

Cleaning, Sanitation and Waste Management, 5.1.06, dated 19/04/08 is on file and SOPs are available for each piece of equipment in the facility. Sanitation schedules are on file and available for all lines.

Frequencies are established as weekly, monthly, daily and as needed. Misc. Facility Cleaning Procedures and Instructions 10.6.1-01. Reviewed records as part of Mock Recall. Cleaning is validated visually through post cleaning inspections (post sanitation checklist) each time lines are cleaned. No trends were observed, and no issues noted.

Appropriate cleaning conditions observed in the different areas in the facility such as processing areas and warehouse areas.

Cleaning of equipment is generally performed on weekends during non-production hours. General cleaning is validated visually.

Employees were thorough and knowledgeable. Training is provided for annually for sanitors. Sanitation training records were reviewed during the audit and were found to be complete and accurate.

No product changeover as only brown sugar is processed.

4.11.7 Cleaning in place (CIP)

A hot water flush is performed on all equipment that cannot be taken apart (tanks, pipes). No chemicals or sanitizers are used per a risk assessment and validation study. Tanks CIP & System Sanitizing Procedures, 10.6-02, validated 19/03/18.

4.11.8 Environmental monitoring

Per a documented risk assessment, none is performed.

4.12 Waste

Waste containers observed inside of processing areas and the dumpster was observed clean and in good conditions. Cleaning, Sanitation and Waste Management, 5.1.06, dated 19/04/08

No product is destroyed unless product is contaminated.

4.13 Management of surplus food and products for animal feed

Nothing is sent to animal feed.

4.14 Pest management

An active and documented pest control program is present Ecolab, is the PCO. The monitoring of the exterior devices occurs monthly and a weekly inspection regime is provided for all other devices. This information is contained in the service agreement that is on file. Integrated Pest management, 5.1.03, 19/04/08.

4.14.3-N/A-The facility does not perform pest control tasks.

All devices at the facility are installed correctly with 105 exterior bait stations, 38 multi-catch, inspected monthly along with 224 interior devices and 23 ILTs. A schematic is on file describing all devices installed in the facility dated which was confirmed by the facility 2019. The map was confirmed during the site inspection with no issues noted. Pest Operator licenses are on file, expiring 19/12/31. Appropriate records were observed on file for chemicals applied on site, reviewed SDS for Contrac. No infestations have been noted. Bird egress is prevented by closed and screened windows and doors.

In depth inspections by a certified pest control operator are conducted annually with the last being 19/05/18. Trend charts were on file and are updated monthly. No relevant pest activity has been reported. A monthly GMP inspection is performed to assure there is no pest control issues.

Service reports are completed after each service and include recommendations and inspections including a monthly GMP inspection is performed to assure there is no pest control issues. Monitoring records for inspections are present and complete with tracking and trending of catch devices.

Staff is trained in pest observation annually.

4.15 Storage facilities

An adjacent warehouse stores the finished sugar and packaging materials with all stock is identified and rotated. All materials were observed off the floor and properly sealed to prevent cross contamination, FIFO is used; Product Storage and Warehousing, 5.1.09 dated 19/04/08.

Controlled atmosphere storage was not applicable to this operation. No external storage observed during the site audit.

4.16 Dispatch and transport

Several written procedures are implemented in the facility describing the activities conducted; Liquid Tankers and Containers, doc. 5.1.14 dated 19/04/08; Dry Van Trailer and Container Shipments, 5.1.12, 19/04/18. All tanker loads and are shipped directly to the customer.

All products are shipped at ambient temperature

Dry products in supersacks or bags are unloaded in an enclosed area in the warehouse. All trucks are inspected prior to loading and information documented on the form "Outbound Truck Inspection form", 10.9.1-02. Reviewed information for trucks being loaded during the audit and the information was complete and current.

In addition, the information during the vertical audit was reviewed with no issues noted. Traceability information is maintained on the BOL. All tanker trucks are shipped out sealed and numbers included on the BOL.

Third party transportation companies are used in the facility for bulk shipments with contracts maintained by the Corporate Office which include instructions for breakdowns (notify shipper) and other requirements.

Vehicles on site (forklifts) are inspected daily and cleaned quarterly.

5. Product control

5.1 Product design/development

There is a corporate Change Management Policy, doc. 3.9, dated 13/04/0 which describes changes to packaging and methods, no product changes are or will be made.

A corporate shelf life study is documented for liquid and dry sugar and includes a review of the HACCP program for new packaging or process methods.

5.2 Product labelling

No labels are required for liquid bulk tankers, but retail and industrial bags are labeled. Policy: 8.2.1 Product Coding & Identification; Policy: 8.2.2 Product Nutritional & Safe Handling Labelling; Policy: 6.1 Food Regulation Compliance & Letters of Guarantee. All lot and production information is contained on the BOL and labels for bags.

There are no claims.

5.3 Management of allergens

There are no allergens stored or processed on site. An allergen risk assessment has been performed as part of the HACCP plan. Allergen awareness training is given annually for all continuing employees.

5.4 Product authenticity, claims and chain of custody

Vulnerability assessments are conducted annually on all raw materials and are included in the risk assessment for each raw material reviewed 19/04/22. Sugar, being the only raw material, is from a sister facility in Idaho; there is no risk of substitution. Processing syrups are provided by approved suppliers. Food Fraud, 9.2, 19/04/08.

All products are Kosher certified by OU with the certificate expiring 20/12/31.

No other claims are made on products manufactured in the facility.

5.5 Product packaging

Product packaging (poly bags) is appropriate for the intended use and are stored under conditions to minimize contamination and deterioration. Bags make up all the brown sugar packaging; bulk is the standard shipping method for the non-brown sugar.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

All batches of finished product are analyzed for physical and chemical parameters including ash, salt content, color, pH, and turbidity. SOPs are present for all tests performed. Documentation is present for lots examined in vertical audit.

Procedure: 7.5-02 Product Sampling: Liquid Products (frequency); Procedure: 5.1.2-05 Brix Testing; Procedure: 5.1.2-03 Color and Turbidity; Procedure: 5.1.2-04 pH.

Pathogen testing is not performed on finished product.

5.6.2 Laboratory testing

There is no pathogen lab on-site.

All parameter testing occurs on-site with micro. and pathogen, yeast and mold testing of all finished products performed at the Amalgamated Sugar Central Lab in Twin Falls, ID. If negative results are found, product is placed on hold and further evaluated.

The Central Lab is ISO 17025 certified; the testing they perform is only quality checks on finished product to verify the site labs' performance. All test methods are certified AOAC, BAM, FDA.

During the packaging stage, labels are checked at the beginning of a run and the information is documented. Label samples are placed in the production papers

The on-site attribute lab performs GLPs and is segregated from the processing areas.

5.7 Product release

The facility has a documented positive release product program which requires the review of lab results prior to the release of the finished product. Product Hold & Release 6.7-01 dated 14/10/01.

Only product that is in compliance with the requirements can be released for sale.

5.8 Pet Food

Nothing is used for pet food.

**6. Process control**

6.1 Control of operations

The company operates procedures and SOPs to verify that the processes and equipment employed are capable of producing consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan.

Operations are controlled using various procedures for product. SOPs are contained on the shared hard drive. Processing parameters are monitored for each batch including water temperature, color, brix and pH.

Interviews indicate employees are familiar with corrective action procedures and the general operations. Only trained and qualified individuals can adjust equipment involved in the process.

6.2 Labelling and pack control

Labels are not required for tanker loads. Labels/coding for bags are examined while being applied to the bag and confirmed by the operator. Labels are placed in the shipping package.

6.3 Quantity, weight, volume and number control

Tankers are weighed prior to loading and after loading to determine net weight. Each bag is weighed to assure correct weight Retail bags use an automatic weigher/bagger with check weights taken every hour on 6 bags.

6.4 Calibration and control of measuring and monitoring devices

Equipment in need of calibrating is clearly identified with an ID number and risk assessed due date, Equipment Calibration: Food Safety doc., 5.1.04, dated 19/04/08. Calibrations are performed and scheduled using a calibration matrix, Calibration Equipment List.

Scales (truck) and rail scales are calibrated annually by the OR Dept. of Weights and Measures with the last dated 19/07/11 and 19/07/30 respectively. Scales were calibrated 19/04/02 by Total Scales; Lab equipment is calibrated annually by Quality Control Services with the last calibration dated 19/03/21. Metal Detectors were calibrated 19/05/17 by RL Scott.

**7. Personnel**

7.1 Training: raw material handling, preparation, processing, packing and storage areas



The company has a comprehensive training program for staff on induction and annual refresher program for continuing employees using Employee Food Safety and Quality Training, 5.1.01, dated 19/04/08 and a computer aided training program, Basicsafe. Quizzes for each training module are given to confirm comprehension. A training matrix is maintained with key tasks and knowledge required.

Along with core training topics (allergens, GMPs, food defense, etc.), labelling and coding is also a subject of training.

Training records for employee various employees were examined and were found to be accurate. Personnel involved with CCP monitoring receive specialized training on CCPs and are evaluated by on-the-job observations.

Contractors are trained by the training team prior to working on site with records maintained.

Training records for various workers were reviewed and found to be complete and accurate dated 19/06/25.

Personnel involved with monitoring and QC receive specialized training. Interviews confirmed the competency and knowledge of each monitor during the audit.

### 7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

GMP requirements are in place for all employees, visitors and contractors. Personal Practices, 5.1.02, dated 19/04/08. Metal detectable blue plasters, tested dated 19/05/14, are used along with instructions regarding the storage and the use and storage of personal medications.

Jewellery restrictions and hair covering usage is restricted based on areas of the facility, with most restrictions such as no watches and hair net usage required in processing areas.

Hand cleaning is conducted at the entry to the production areas and after being in contact with dirty surfaces.

A visitor and contractor GMP policy is present which is to be reviewed and signed prior to entry to the facility. The policy contains information regarding allergens and general allergen requirements.

### 7.3 Medical screening

All new employees and visitors are required to be medically screened prior to employment. The site has Employees are instructed to inform their supervisor if they are sick per GMP requirements along with visitors and contractors.

Management can request that employees and non-employees leave the processing areas and refer them to competent medical experts if required.

Each employee and visitor sign off on training records indicating that they are aware of these requirements; it is also a part of the conditions of employment and entry to the facility.

### 7.4 Protective clothing: employees or visitors to production areas

Suitable clothing provisions are conveyed to all staff, visitors and contractors that enter and work in production areas. Only shirts and pants are provided to employees and are laundered by Cintas Personal Practices, 5.1.02, dated 19/04/08

The facility requires that gloves be used as a safety requirement only. Blue colored disposable gloves are used and are changed when soiled, after breaks or after touching dirty surfaces..

7.4.7 NA- All clothing can be laundered. No un-washable PPE observed in the facility.

**8. High-Risk, High-Care and Ambient High-Care Production Risk Zones**

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

N/A

8.2 Building fabric in high-risk and high-care zones

8.3 Maintenance in high-risk and high-care zones

8.4 Staff facilities for high-risk and high-care zones

8.5 Housekeeping and hygiene in the high-risk high-care zones

8.6 Waste/Waste disposal in high risk, high care zones

8.7 Protective clothing in the high-risk high-care zones

**Details of non-applicable clauses with justification**

Clause/section reference	Justification
1.1.13	Logo not being used.
3.5.4	No outsourcing



3.9.4	Rework is not used.
4.3.5	No high-risk areas defined
4.3.6	No high-care areas defined
4.3.7	No ambient high-care areas defined
4.3.9	No temporary structures constructed
4.4.4	No high-risk / high-care areas defined
4.4.5	No suspended ceilings or roof voids present
4.4.6	No walkways.
4.4.13	No high-risk areas defined
4.5.3	No legislation that specifically permits the use of water which may not be potable for initial cleaning
4.8.4	No high-risk areas defined
4.8.5	No high-risk areas defined
4.8.10	No catering facilities provided.
4.9.4.1	No products packed into glass or other brittle containers
4.9.4.2	No products packed into glass or other brittle containers
4.9.4.3	No products packed into glass or other brittle containers
4.10.5	No in-line monitoring devices.

4.10.6	No rigid packaging.
4.11.8	No environmental monitoring.
4.12.1	Licensing for the removal of waste isn't required by law
4.13.3	No products intended for animal feed
4.14.3	The site doesn't undertake its own pest control
4.15.4	No controlled atmosphere is required
4.15.5	No outside storage
5.3.7	No allergen related claims are made.
5.4.5	No claims made about the methods of production
5.8	Nothing is used for pet food.
6.1.4	There is no variation in processing conditions.
6.2.4	No on-line vision equipment used to check product labels and printing
7.4.4	No high-risk / high-care areas defined
7.4.7	No items of personal protective clothing that are not suitable for laundering are provided.



<b>9 - Traded Products</b>
<b>9.1 Approval and performance monitoring of manufacturers/packers of traded food products</b>
N/A
<b>9.2 Specifications</b>
<b>9.3 Product inspection and laboratory testing</b>
<b>9.4 Product legality</b>
<b>9.5 Traceability</b>