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Facility Name:	Loveland Facility
Facility Address:	1149 Madison Avenue, Loveland, Colorado 80537
Phone:	303.659.2151 / Local Lead Phone: 970.690.7908
Plant/Facility Manager:	Joe Toste
Local HACCP Coordinator:	Lacey Messing
Number of Employees:	<10
Temporary Employees:	Yes
Facility Description:	The Loveland facility operates the sugar warehouse portion of a non-operational beet sugar factory. This warehousing facility receives granulated sugar in bagged or bulk form and the product is either stored in eight concrete silos or warehoused. Bulk product is screened and loaded into bulk railcars or packaged into flexible intermediate bulk container (FIBC) totes. Packaged product is loaded into boxcars, dry van trailers, or containers.

Products:	Granulated Sugar			
Third Party Audit Standard:	AIB Consolidated Standards for Inspection			
Certification Body:	AIB International			
Import Capability:	Yes			
Ingredients/Raw Materials:	Granulated Sugar			
Packaging:	FIBC Totes			
Prerequisite Programs :	1. Personnel Practices	2. Employ	ee Training	3. Equipment Calibration
	4. Integrated Pest Management	5. Facility Maintena	& Equipment nce	6. Cleaning & Sanitation
	7. Air & Water Programs	8. Physica vention &	l Contaminant Pre- Control	9. Product Storage & Warehousing
	10. Sanitary Transportation	11. Allerge Agents	ens & Sensitizing	12. Chemical Control & Approval
	13. Supplier Approval	14. Visitor	ſS	
Joe Toste	Warehouse Manager		AIB Training	
Mike McClain	Maintenance Lead		AIB Training	
Lacey Messing	Food Safety & Quality Profess	ional	Preventive Controls	Qualified Individual
Kelly Malone	Quality Assurance Manager		Preventive Controls	Qualified Individual

Food Safety

Team

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Document No.: PD-01

General Product Information		
Product Name:	Granulated Sugar	
Technical Name:	Sucrose	
Product Description:	Sucrose is a nonreducing disaccharide composed of glucose and fructose bonded by an oxygen atom. It is derived from sugar beets or sugar cane and is used as a food and a sweetener.	
Ingredients:	Crystalline sucrose	
Intended Use:	This product is used as an ingredient in many food products and functions as a sweetener.	
Intended Consumer:	Granulated sugar is sold as retail or distributed to food processors that provide products to the general public, including high risk groups.	
Shelf Life:	5 years, 70%RH, 90°F	
Labeling Instructions:	None	
FDA Classification:	GRAS <u>21 CFR 184.1854</u>	
Storage:	Silo storage, ambient. Packaged product is warehoused.	
Distribution:	Granulated sugar is distributed in bulk or packaged form. Bulk sugar is transported by bulk rail or truck. Packaged sugar is distributed by trailer or container.	
Technical Information		

Chemical Formula:	$C_{12}H_{22}O_{11}$
Water Activity (a _w):	0.22 ¹
Moisture:	0.04% Max.
Sulfites:	2 to 5 ppm. Must be less than 10 ppm.
Microbiological:	Will not support the growth of vegetative pathogens. ^{2,3} Meets ISBT ⁴ and NFP ⁵ standards for use in carbonated beverages and canned foods.

Preventive Controls		
Process Control:	CCP Metal Detection (CCP 1 Bulk or Tote Metal Detector)	
Allergen Control:	None	
Sanitation Control:	None	
Supply-Chain Control:	Approved Supplier for Sugar Ingredient and Third-Party Audit Report	

¹ Water Activity Values of Select Food Ingredients and Products

² <u>Microbial Risk Assessment: Pathogen Challenge Evaluations of Granulated and Liquid Sugar</u>

³ Fate of Bacterial Pathogens and Indicator Organisms in Liquid Sweeteners

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<sup>4</sup> ISBT
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⁵ GMA Canner's Standard



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Process Preventive Control: Critical Control Point Summary

Proc	ess Control Step:	CCP Metal Detection (CCP 1 Bulk & Tote Metal Detector)
Haza	rd(s):	Metal
Para critic	meters, values, or al limits:	Functioning metal detector that can detect 1.5 Fe, 1.8 NF, 2.0 SS, and 2.0 Al mm spheres.
	What:	All bulk ant tote product passes through an operating metal detector and previously packaged product has gone through a metal detector at supplier's facility.
oring:	How:	Monitor according to SOP <u>6.3-01 CCP Monitoring: Metal Detector</u> .
Monito	Frequency:	Conduct the monitoring prior to startup if exceeded 24 hours. Monitoring will occur after each vessel. Tote products are tested prior to startup, every 2.5 hours of operation, and at the end of daily operations.
	Who:	Permanent trained staff
Corrective Action:		Operator notifies supervisory personnel. Supervisory personnel complete corrective action according to SOP <u>6.3.4-03 HACCP Deviation: Metal Detector</u> .
cation:	Monitoring Activity:	Supervisory personnel verify the monitoring activity through record review within 7 days of record generation. The review is indicated by a signature and date.
Verifi	Food Safety Plan:	The food safety plan is incorporated into annual internal audits. The plan, CCP selection, and CL determination are reviewed/assessed annually.
	Critical Control Point:	CCP selection is reevaluated annually in light of emerging technological and regulatory information. This review is documented on record <u>Validation</u> .
Validation:	Critical Limits:	CL or parameter selection is reevaluated annually in light of emerging technological and regulatory information. This review is documented on record <u>Validation</u> .
	Scientific & Tech- nical Information:	Decisions for the hazard analysis, CCP selection, and CL selection have been based on scientific and technical information. This information is posted to the corporate intranet and may be accessed through this <u>link</u> .
Reco	rds:	Monitoring Activity: <u>6.3-01.0 Critical Control Point: Packaged Product Metal</u> <u>Detector</u> or <u>6.3-01.1 Critical Control Point: Bulk Loading Metal Detector</u> . Records are retained for three years.

Procedural documentation is available on the corporate intranet through direct links or through the quality assurance tab. This documentation will be made available to customers upon request.

Supply-Chain Pro	gram
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Hazards Requiring a Supply -Chain-Applied Control:	Hazard analysis determined that incoming bulk and packaged sugar requires a supply -chain-applied control for metal contamination. In the absence of a supplier-applied control, there could be the potential for hazardous metal contamination based on sugar processing equipment and facilities. Some of this product might be ware- housed and distributed directly to the customer without further processing.
Preventive Controls Applied by Supplier:	Approved suppliers continually monitor sugar by passing all product through metal detectors or magnets. These actions are documented in a supplier's records.
Verification Activities:	Based on supplier performance and the low risk associated with material, a 2nd or 3rd party audit by a qualified auditor is used to verify supplier's control of metal haz- ard. Preference is given to GFSI certification.
Verification Procedures:	The Quality Assurance Team will verify that suppliers have the appropriate documen- tation on an annual basis. These verification activities include: an onsite audit(s) per- formed by a third-party audit and report provided based on their certification stand- ard. Verify the facility's controls for metal detection and removal. A qualified individ- ual (QI) will conduct onsite audits, third-party auditors or company affiliated PCQI's. Must retain FDA-required records and have access within 24 hours of request from regulatory inspectors. Lastly, supplier must inform the facility of any changes to the product composition or if it includes any allergens. Refer to the Food Safety & Quality Assurance Manual, Supplier Approval Policy.
Verification Records:	Supplier audit report made <u>available</u> – Beet Sugar.
Receiving Facility Procedures:	Receiving facility only accepts product from approved suppliers as outlined on the <u>Approved Supplier Register</u> . Facilities hold and do not accept shipments from unapproved suppliers. If this occurs, it is only permitted during emergency situations provided facilities notify quality assurance and obtain and review, third-party audits. If

not, temporary approval may be granted through a second-party audit from a company-affiliated PCQI. Inspection and receipt records are maintained locally.

Receiving Records:

Amendments		
Update the supply chain program to match the current supplier approval policy.		
Added 2 to the surge bin for tote machine.		
Removed all hyperlinks to each individual hazard analysis (one link for hazard analysis). Updated the CCP Summary page to "Conduct the monitoring prior to startup if exceeded 24 hours. Monitoring will occur after each vessel".		
Updated Supply Chain links to the NSM website for the Approved Supplier list and beet sugar reports.		
Removed Jeremy Adamson from Corporate HACCP Coordinator.		
Updated the Prerequisite Program to match the new Quality Manual.		
Added Joe Toste and Mike McClain with AIB Training.		
Added Lacey Messing and training.		
Added local lead contact, Silvestre Bello, and contact information. Added tote metal detec- tor monitoring information to every 2.5 hours of operation.		
Removed the local organizational chart. Developed the Supply-Chain Program and added links to the corporate recall procedure.		
Changed the Org Chart to maintenance staff instead of special projects. Added PCQI train- ing for Bill Enderson.		
Corporate SOPs were modified. Quality assurance will verify documentation during inter- nal audits rather than verifying one lot per week. Added Mike McClain to the team to re- place Mike Palser.		
Corporate standardization of SOPs. SOPs and blank record copies have been moved from the HACCP plan to the corporate intranet.		
Screens were added to bulk loadout lines. The flow diagram was modified to include changes. Updated SOP and record to facility screen inspections.		
Changed frequency on master plan from between each car to after each car is loaded be- fore yearly shipping season starts. Added Mike Palser to HACCP team.		

Training Log		
Pending Date	Joe Toste and Mike McClain pending AIB certificate.	
08/26/2016	Lacey Messing PCQI Training	
11/01/2011	Joe Toste attended a two-day HACCP course.	