SQF Food Safety Audit Edition 9

Amalgamated Sugar Co - Paul

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
6214 | 310079

AUDIT RATING
100
Excellent

DECISION DATE
12/14/23

AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
11/14/24

AUDIT DATES
11/13/23 - 11/15/23

EXPIRATION DATE
01/28/25

ISSUE DATE
12/14/23

Facility & Scope

Amalgamated Sugar Co - Paul
50 S. 500 W.
Paul, Idaho 83347
United States

Food Sector Categories:
19. Food Ingredient Manufacturing

Products:
Granulated Sugar

Scope of Certification:
Granulated Sugar

Certification Body & Audit Team

CICS Americas Inc.
8350 Ashlane Way Suite 104,
The Woodlands, TX 77382

CB#: CB-1-CICS
Accreditation Body: ANSI
Accreditation Number: 1087

Lead Auditor: Luis Palacios (124403)
Technical Reviewer: Cesar Hernandez (120868)

Hours Spent on Site: 16
Hours of ICT Activites: 0
Hours Spent Writing Report: 8

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** DYLAN DEAN
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** DDEAN@AMALSUGAR.COM
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** KELLY MALONE: CORPORATE FOOD SAFETY SPECIALIST, WES HIGLEY: WAREHOUSE MANAGER, RACHEL LINDAUER: FACTORY LAB SUPERVISOR, BROCK O'DONELL: MECHANICAL SUPERVISOR, KRIS HENNA: PRODUCTION MANAGER, DYLAN DEAN: SQF PRACTITIONER, LUIS PALACIOS: SQF AUDITOR.
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** THE PAUL FACTORY WAS CONSTRUCTED IN 1916. IT IS THE LARGEST OF THREE FACTORIES LOCATED IN IDAHO THAT PROCESSES SUGAR BEETS. THIS FACILITY PRODUCES GRANULATED SUGAR WHICH IS CONDITIONED AND STORED IN SILOS. STORED SUGAR IS SCREENED AND LOCADED INTO BULK CARDS AND TRAILERS OR PACKED INTO POLY BAGS. PACKAGED PRODUCT IS SHIPPED VIA TRUCK OR RAIL TO DISTRIBUTION SITES OR DIRECTLY TO CUSTOMERS. NUMBER OF EMPLOYEES: 400-500 EMPLOYEES BASED ON SEASON. DURING THE AUDIT A TRACEABILITY EXERCISE WAS CONDUCTED WITH THE FOLLOWING PRODUCT: RESOURCE 080050NPW-TAS_50# EXTRA FINE SUGAR NSM POLY, LOT PREFIX: AR LOT # 23312, PALLET # 17
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** KELLY MALONE: CORPORATE FOOD SAFETY SPECIALIST, WES HIGLEY: WAREHOUSE MANAGER, RACHEL LINDAUER: FACTORY LAB SUPERVISOR, BROCK O'DONELL: MECHANICAL SUPERVISOR, KRIS HENNA: PRODUCTION MANAGER, DYLAN DEAN: SQF PRACTITIONER, LUIS PALACIOS: SQF AUDITOR.
Auditor Recommendation	Auditor Recommendation **RESPONSE:** PROCEED WITH RECERTIFICATION. THIS TIME NO VIOLATIONS WERE IDENTIFIED.

2.1.1 Management Responsibility

There is a corporate policy within the Food Safety and Quality Assurance Manual, chapter 11. Commitment to Food Safety and Quality. Updated on 10/16/2023, Rev. 3. All of the policies are documented in the Doc. Directory on line for all the Corporation. In regard to food safety culture, every year they have a survey to all the employees, year 2022-2023 Food Safety Culture Survey Results: it includes relevant questions. The approach this time is to inform the staff, that is why the questions are: have you been informed of audit findings? have you been informed of customer complaints=. they have a quarterly newsletter. The last newsletter included elements in regard to quality news: upcoming audits: unannounced audit for SQF and one client's audit. Food Safety objectives for year 2023 are: customer satisfaction and shippiging accuracy: maintain a successful shipment rate of 99.5%. Maintain a successfuul shipment rate of 99.9% for food safety related issues where culpability is assgined to facility: overall 2023: 100.00%. Investigations for complaints are inititated based off of severity in a timely manner with the goal of 100%: overall 100%. Master sanitation scheduled with a completation rate of 85%: overall 2023 95%. Preventive maintenance inspections with completion rate of 80%: overall 2023 88%. There is a reporting instruction in which it is evident that the food safety position reports directly to the corpoate office and this was uipdated in 01/06/2023. Both SQF practitioners accredit the HACCP training certificates. HACCP Oline, 24-Dec-2019 by AIB International. Backup: Calista Newman, Practical Food Safety and HACCP Workshop, conducte by University of Idaho, Boise, October 8-10, 2013.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to:
i. Supply safe food;
ii.Establish and maintain a food safety culture within the site;
iii. Establish and continually improve the site's food safety management system; and
iv. Comply with customer and regulatory requirements to supply safe food.
The policy statement shall be:
v. Signed by the senior site manager and displayed in prominent positions; and
vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum:
i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures;
ii. Adequate resources are available to meet food safety objectives;
iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;
iv. Employees are informed and held accountable for their food safety and regulatory responsibilities;
v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and
vi. Employees are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.3 The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel.
Job descriptions for the key personnel shall be documented.
Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.4 Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to:
i. Oversee the development, implementation, review, and maintenance of the SQF System;
ii. Take appropriate action to ensure the integrity of the SQF System; and
iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.5 The primary and substitute SQF practitioner shall:
i. Be employed by the site;
ii. Hold a position of responsibility related to the management of the site's SQF System;
iii. Have completed a HACCP training course;
iv. Be competent to implement and maintain HACCP based food safety plans; and
v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.6 Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.7 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.8 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

RESPONSE: COMPLIANT

EVIDENCE: No blockout dates were identified for this current unannounced audit.

2.1.2	**Management Review** The company's manager normally meets on a monthly basis, on-and-off they meet quarterly, it depends on the dynamics of the business. The auditor could see the management minutes, for instance: July/August/September, this includes: Food Safety Incidentes, Current Corrective Actions. including customer's audits, this includes a particular situation in regar to food defense system was challenged and Colorado Terminal Manager was able to enter into the warehouse and was not questioned or caught; food safety inspections, Customer complaints. It was evident that the whole system has been reviewed during the year by the management team according to the minutes. Member of the management team present in the meetings: plant manager, facility manager, production manager, warehouse manager, and FSQP.
2.1.2.1	The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.1.2.2	The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.1.3	**Complaint Management** Customer Complaint Management procedure is available, within the Quality Assurance Manual. The purpose of this policy is to outline the company's program for handling customer complaints. Effective complaint handling drives root cause analysis and continuous improvement. Policy: The company addresses all customer complaints and the NSM Quality Assurance Team is responsible for general oversight of the complaint program, including overseeing root cause investigation and closure and customer correspondence. During year 2023 no food safety issues were consider as customer complaints, only quality issues. Those include: product clumping, packaging damage, operator error. Incident trrending is in graphs: year 2022 versus year 2023. It varies from 0 to 8 per month, but they are all about quality issues.
2.1.3.1	The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.1.3.2	Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents. **RESPONSE:** COMPLIANT

EVIDENCE:

2.1.3.3 Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1 Food Safety Management

There is a document called National Sugar Marketing, Food Safety & Quality Assurance Manual, 2022 General Revision, there is a once a year meeting to review all the documents. QA Manual and form Revision Log, the dates differ in days, it is available in smart sheet and all the user have access to this. Contents: 1.0 Management Commitment, 2.0 Document Control, 3.0 Regulatory compliance, 4.0 Product Identification, 5.0 Food Safety: Good Manufacturing Practices & hazard analysis & risk based preventative controls, etc.

2.2.1.1 The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include:
i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;
ii. The food safety policy statement and organization chart;
iii. The processes and products included in the scope of certification;
iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known);
v. Raw material, ingredient, packaging, and finished product specifications;
vi. Food safety procedures, prerequisite programs, food safety plans;
vii. Process controls that impact product safety; and
viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1.2 Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food.
All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2	**Document Control** The document owner drafts the document. The quality assurance manager reviews the document for accuracy and compliance with food safety and quality assurance requirements. The plant manager reviews the document for feasibility of implementation. The document owner, the quality assurance manager, and the plant manager approve the document. The document is communicated to all employees who need to know about it. The document is made available to all employees who need to access it. The document is used in accordance with its procedures. The document is reviewed on a regular basis. The document is updated as needed to reflect changes in food safety and quality assurance requirements. Documents are retained for a period of five years. Documents that are considered to be critical to the safety or quality of the food products may be retained for a longer period of time. Documents that are no longer required are destroyed in a secure manner.
2.2.2.1	The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.2.3	**Records** ASC Paul is storing its food safety and quality assurance documents in electronic database. This makes it easy to share and access documents from anywhere. ASC Paul is also scanning and saving all paper documents related to food safety and quality assurance. It was observed during the audit that the records are available, they have this AS 400 system and all the records were there.
2.2.3.1	The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.2.3.2	All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.2.3.3	Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.1	**Specification, Formulation, and Realization** There is no product design in this plant.

2.3.2	**Specifications (Raw Material, Packaging, Finished Product and Services)** Fine Granualted sugar, bulk. Product Data Sheet. Product Description: this pure granulated sugar is a natural, ready-to-eat, food grade product produced from purified, filtered, and crystalized juice from domestically-grown sugar beets or raw cane sugar. Granulated sugar is minimally processed, kosher certified, halal suitable, vegan suitable, and screened to specification. This product can be referred to Fine Granulated Sugar depending or region. Typical uses include confectionary, beverages, jam and marmalade, baked goods, canning, canning, dairy products and fermetation. Description and specs for the primary packaging material was reviewed by the auditor: Extra Fine Granulated Sugar 50 lbs. net (22.68 kg), Real Sugar. this is the bag that is being used as primary packaging material. Approved contact service providers include transports, secondd party lab, paperless program, transport bulk sugar to customers, recycle poly bags and carboard, certification for metal detectors, etc. Hood Packaging Corporation, Plastic Division, January 4, 2023. Letter of guarantee in regard to the food safety of the packaging material, referened to: US FDA 21 CRF 177 Indirect food additives, CFR 175.105 Adhesive, and the European regulations and Canadian regulations.
2.3.2.1	The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.2	Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.3	All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.4	Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.5	Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season). **RESPONSE:** COMPLIANT **EVIDENCE:**

2.3.2.6 Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency.
In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.7 Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.8 Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.9 Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable:
i. Microbiological, chemical, and physical limits;
ii. Composition to meet label claims;
iii. Labeling and packaging requirements; and
iv. Storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.10 Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained.
A list of all the above specifications shall be maintained and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Manufacturers

This site does not use contract manufacturers.

2.3.4 Approved Supplier Program

Supplier Approval: The purpose of this policy is to define the requirements for supplier approval programs relating to sugar products, ingredients, processing aids (final product), packaging, equipment, and contract services. These requirements ensure that incoming materials and contracted services are of appropriate quality and conform to agreed specifications. the company ensures facilities maintain supplier approval programs for sugar, sugar products, ingredients, processing aids, packaging materials, equipment, contract manufacturers, and contract service providers. These programs mitigate food safety and quality risks that might be carried from suppliers or, in some cases, sister facilities. The company controls and verifies all the incoming materials, such as the process aids, packaging materials, etc. The auditor took a sample of suppliers. For the supplier that provides primary packaging materials, Hood Packaging (Calgary), the evaluation includes: on time delivery, any coplaints for the year, competitive pricing, food safety audit on file, audit certificate on file, letter of guarantee. This company is SQF certified and the certificat is current and valid.

2.3.4.1 The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.
A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained.

Code Amendment #2
Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

RESPONSE: COMPLIANT

EVIDENCE: Within the Food Safety Manual, chapter 5.17. Emergency Receipt from Non-Approved Suppliers: receiving products supplied from unapproved suppliers is only permitted ruing emergency sitautions provided facilities notify quality assurance and obtain and review current, ghrid - party audits. Additional analyses may be requested depending on the incoming product. Facilities will request all remaining documentation to add suppliers to the approved register in a timely manner.

2.3.4.2 The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum:
i. Agreed specifications (refer to 2.3.2);
ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier;
iii. A summary of the food safety controls implemented by the approved supplier;
iv. Methods for granting approved supplier status;
v. Methods and frequency of monitoring approved suppliers;
vi. Details of the certificates of conformance, if required; and
vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.3 Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.4 The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.5 Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

RESPONSE: COMPLIANT

EVIDENCE: All the sites under Corporate ownership are GFSI certified.

2.3.4.6 Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1 Food Legislation

For specific regulatory requirements, the Practitioner commented about the presence of SO2 in the finished product. }Within the specs this is what is stablished: Parameter: Sulfur Dioxide (SO2), Specification: <= 6, Unit of measure: ppm (mg/kg), Test methods(s): titrimetric, COA: No. Auditor review sample reports retrieved form the electronic system and they were within the parameters. There is a visit report from an inspection by the Department of Health and Human Services, FDA. Date: 12/10/2021. No findings or observations upon this visit. At the closing of the inspection, Form FDA 483, Inspectional Observations was not issued to the firm. There were no samples collected during the inspection. There were no refusals encountered during the inspection. No consumer illness or injury complaints or recalls were on file for follow-up during this inspection. Within the Food Safety manual there is a chapter 3.1. FDA Registration & Regulatory Compliance. The company ensure that all facilities utilized to process, pack, or hold our sugar products meet state and federal food regulations. As such, operating facilities will meet FDA registration requirements, which includes intial registration. This requirement extends to company-operated and contracted facilities. It is established that the SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event.

2.4.1.1 The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1.2 The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Good Production Practices

There is a Quality and Food Safety Manual, that outlines all the GMP requirements, aligned to the SQF Code of Manufacturing, applicable module 11.

2.4.2.1 The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2.2 The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Safety Plan

Within the Food Safety Manual, chapter 5.0 Food Safety: Good Manufacturing Practices & Hazard Analysis & Risk Based Preventative Controls. The policy describes pre-requisite programs employed to meet FDA requiments for Current Good Manufacturing Practices (GMP) as described in the Code of Federal Regulations 21 part 117 and to support facilities Hazard Analysis and Critical Control Point (HACCP) programs. Team: Plant manager, Warehouse Manager, some senior foremen, factory lab supervisor, mechanical supervisor, Food Safety & Quality Professional. Tecnical information of the product: water activity: 0.22, moisture: 0.04% Max, sulfites: 2 to 5 ppm. Must be less than 10 ppm. Microbiological: will not support the growth of vegetative pathogens. Meets ISBT and NFP standrds for use in carbonated beverages and canned foods. Process Flowcharts: Beets fo Fillmass: the flowchart outlines the factory mill, including slicing, extraction, purification, and crystallization. The separation in diagrams is based on product risk and resulting hygienic zoning. The factory process precludes any food safety hazards in prior to crystallization. Process Preventive Control: Critical Control Point Summary: Process control step: CCP Metal Detection (Packaged & Bulk Metal Detectors), Hazards: metal, Parameters, values, or critical limits: Functioning metal detector that can detect 1.5 Fe, 1.8 NF, 2.0 SS, and 2.0 Al mm spheres. Monitoring: What: all product passes through an operating metal detector, how<. monitor according to SOP 6.3-01 CCP Monitoring: Metal Detector. Frequency: conduct the inspection at the beninning of a startup, a shutdown of two hours or longer, at the end of a prodution run (no following shift), and at least every 1.5 on the Concetti. Bulk detectors are tested after each vessel. Who: trained warehouse operator. Reccords: Monitorin Activity: 6.3.-01.0 Critical Control Point: Packaged Product Metal Detector and 6.3.-01.1 Critical Control Point - Bulk Loading Metal Detector. Records are retained according to retentional policies. The auditor asked for the information recorded for the traceability exercise: Resource 080050NPW-TAS_50# EXTRA FINE SUGAR NSM POLY, Lot Prefix: AR Lot # 23312, Pallet # 17.

2.4.3.1	A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.2	The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.3	The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.4	Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.5	The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.6	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.7	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.8	The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.9	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.10	Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.11	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.12	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.3.13	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.4.3.14 The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.15 Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.16 Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.17 Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE: Preventive Controls: Process control: CCP Metal Detection (CCP 1: A-side Bulk, CCP 2: B-side Bulk, CCP 3: Concetti, CCP 4: Bulk Truck). Allergen control: none, Sanitation control: none, Supply-Chanin control: none.

2.4.4 **Product Sampling, Inspection, and Analysis**

The evidence of the testing was taken from the CoA of the product being traced during the audit: NATIONAL SUGAR MARKETING, Certificate of Analysis, MINI-CASSIA Factory, Date: 11/14/23, Customer # 10407121. Manufacturing date: 11/08/23. Resource number: 080050NPW-TAS 50# EXTRA FINE SUGAR NSM, Lot Number: AR23312, Result: moisture 0.027 %, Cond Ash: 0.011 %, Sediment: 0.5 PP, Color: 29.4 IU. For the traceability exercise, the auditor required the retained samples of this lot: the retained samples was available in a timely manner from the lab: Order # 2193775, Resource # 080050NPS-TAS, Customer # 10407264, CAR # MWCS 500743, CAR LOT# AR23312, BG, Pallet # 69. Request # 1651114, SILO # 1, 6. Sugar type: X-Fine.

2.4.4.1 The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented.

The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements.

Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.2	Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11). **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.4	Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.5	Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelflife of the product. **RESPONSE:** COMPLIANT **EVIDENCE:**
	EVIDENCE:
2.4.4.6	Records of all inspections and analyses shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.5	**Non-conforming Materials and Product** Food Safety & Quality Assurance Manual, Nonconforming Product & Materials. The Company has established methods for identifying and handling nonconforming products or materials. Nonconforming products: Include products that are not suitable for direct sale without further processing or reclassification. These products are considered downgraded products but should not be allowed to be further contaminated with the intent of removal.
2.4.5.1	The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.4.5.2	Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.6	**Product Rework** Site's policy is that they do not rework. Company does not repack either.
2.4.7	**Product Release** 7.3. Product Hold & Release. 7.3.1. Purpose: the purpose of this policy is to outline the methods and responsibilities for holds relating to products, ingredients, packaging material, and equipment. 7.3.2. Policy: Partner facilities implement and maintain hold programs that include positive release mechanisms and incident-driven hold procedures. Positive release ensures that defined testing and monitoring passes acceptance criteria before releasing product to commerce and incident - driven holds evaluate risk before determining disposition.
2.4.7.1	The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.7.2	Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.7.3	In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.8	**Environmental Monitoring** Risk/Vulnerability Assessment: this is a riks assessment performed by the corporate basis to formally document and evaluate risk associated with environmental pathogens. It is concluded, through testing and peer reviewed journals, that environmental pathogen testing is not required for sugar products.

2.5.1	**Validation and Effectiveness (Mandatory)** Critical control point: CCP selection is reevaluated annually in light of emerging technological and regulatory information. This review is documented on record 7.1.03 Validation. Critical limits: CL or parameter selection is reevaluated annualy in light of emerging technological and regulatory information. Decisions for the hazard analysis, CCP Selection, and CL selection have been based on scientific and technical information. Validated by: Mr. J.A., Rev. 3: Revised/Review Date: 01/03/2023. Validation Frequency & Type: Reg. Ref. 21 CFR 117.160 (b). Annual Review / Assessment, Critical control point: Methods: Regulatory Requirements: Guideline FDA CPG Sec. 555.425 Food Adulteration Involving Hard or Sharp Foreign Objects (7-25 mm). Customer Specifications: Second - party audits and supplier expectation manuals indicate that several customers require metal detector installations and CCP designation. Customer Complaint Evaluation: review of the annual complaint summary has indicated the CCP controls for metal detectors have been and should continue to be effective. Validation Element: Magnet Critical Limit Selection.
2.5.1.1	The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.5.2	**Verification Activities (Mandatory)** Monitoring activvity: Supervisory personnel verify the monitoring activity through record review within 7 days of record generation. The review is inddicat4ed by a signature and date. Food Safety Plans: the food safety plan is incorporated into annual internal audits. The plan, CCP selection, and CL determination are reviewed/assessed annually.
2.5.2.1	The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.5.2.2	A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.5.3 Corrective and Preventative Action

The Corrective and Preventative Action program is written in “Corrective Actions & Root Cause Analysis, section 1.4." (dated 06/14/2022). It describes the methods and responsibilities for investigating, resolving, and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are required to be documented. Records of investigations and corrective actions were reviewed during the audit for internal holds and internal inspections. Corrective actions were maintained in each specific program. These were found to have proper reviews, investigations, corrective and preventative actions, and resolutions documented. Sample of a corrective action was taken: Record No. 7.4.-02.0. Date: 10.6.2023. Corrective Action No. 23.06. Description of problem: during the internal audit it was discovered that the ILT glue boards were missing the date in the back and some placards were missing from th wall. Root cause: the packards are stickers and over time due to brushing sugar off of beams and walls the stickers lose their stick. PCO had come the day before and trhough that the had dated glue boards. Preventive Action: talked to PCO about placards missing. Stickers were replaced and glue boards have been dated.

2.5.3.1 The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.3.2 Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4 Internal Audits and Inspections

8.3.1. Purpose: the purpose of this policy is to outline the Company's Internal auditing program. Internal auditing consists of both corporate internal audits among Partners and local facility internal inspections. 8.3.2. Policy: The Company conducts inter-partner internal audits and local facility inspections to ensure food safety, and quality programs are implemented, monitored and verified. This program verifies compliance with regulatory requirements, company standards, and certification standards. 8.3.2.1. Personnel conducting internal auditing must receive formal training in internal auditing. Internal Audit Report, Scoring: 97.94%. Fully compliant: 276, Partially compliant: 15, Area Needs Improvement: 6, Not applicable: 37, Not scored: 9, No. of questions: 347. Audit Dates: Documentation audit date: 08/22/23, Inspection Audit Date: 09/12/23. A team of internal auditors: warehouse manager, Director fo Quality Assurance, Director of Technical Services, etc.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure:
i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool;
ii. Objective evidence is recorded to verify compliance and/or non-compliance;
iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and
iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.2 Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall:
i. Take corrections or corrective and preventative action; and
ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.4 Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3.
Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1 **Product Identification and Traceability**
4.0 Product Identification. 4.1. Product Lot Numbers. All products packaged and shipped are identified by unique lot number codes to facilitate traceability. Lot numbers and manufacturing dates are assigned as granulated sugar is packaged or products are made and packaged / loaded, e.g. liquid sucrose into a tanker, brown sugar, or powdered sugar. Sugar that is reprocessed such as work in process, reconditioned, or conversion sugar (bulk rail to bulk truck) will be assigned a new lot number.

2.6.1.1 The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure:
i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and
ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1.2 Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person.
Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved.
Product changeover and label reconciliation records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.2 Product Trace

4.4. Traceability. 4.4.1. Purpose: the purpose of this policy is to define the standards for facilities to maintain traceability programs and to outline traceability requirements for finished product, ingredients, and packaging materials. 4.4.2. Policy: Facilities perform trace exercises for finished products and raw materials (ingredients and packaging materials). Trace exercises evaluate a given facility's ability to identify product produced. Mock trace of Product: Date of trace: 10/18/2023, Product Lot # AR23259, Product date: 9.16.2023, Start time: 8:32, End time: 9.39, Discrepancy: 0.00%, Total Shipped: 29647.30, total on Hand: 0. Total time: 1:07.

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure:
i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier;
ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.);
iii. Traceability is maintained where product is reworked (refer to 2.4.6); and
iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2).
Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3 Product Withdrawal and Recall (Mandatory)

3.2. Recall Program & Testing: 3.2.1. Purpose: the purpose of this policy is to define the requirements for developing recall procedures, conducting recalls, and performing recall testing exercises. 3.2.2. Policy: National Sugar Marketing and Partner jointly generate and maintain a documented recall program that complies with current regulations. The program assigns responsibility and ensures that, if necessary, mechanisms are in place to effectively remove products from commerce promptly to protect customers and reduced the cost impacts of a recall. The plan is tested each calendar year against standards for success, and NSM or facilities implement corrective actions when testing reveals opportunities for improvement. RECALL EXERCISE STATUS REPORT August 4, 2023. Scope: Mini Cassia Mock Recall will include the lot identified, product loaded and customer who received the product. Summary of activities: The test was initiated through an email and phone call at 8.00 am. Mock Trace conducted on Granulated Sugar packaging, lot # AR23194 produced on July 13, 2023. Scenario: Customer notified of a bold fastener found inside a load for lot AR23194. Recovered 100% of granulated sugar, 11,100 CWT. The AR23193R5 shows it is tied with the AR23194 and it has been included onto the summary page.

2.6.3.1	The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.3.2	The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.3.3	Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.3.4	SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.4	**Crisis Management Planning** Crisis Management Plan, Document 3.8.S-001. Revision # 20. The intent of this procedure is to work in conjunction with the local Paul Facility Emergency Response & Contingency Plan, and to outline the food safety and quality measures in place to ensure that any product affected by potential crises is handled accordingly. This procedure is to only be enacted once the crisis has been addressed and the area been deemed as safe for personnel. Situtations considered: Contamination and/or recall, major equipment failure, power failure, explosing and/or fire, etc. Management Review Records - Crisis Management Test Summary: Date 10/16/2023, Threat: Bomb threats. Description: On October 16th the front office received a phone call tha there was a bomb on site. Management team would be gathered and start evacuation of non-essential personnel. Once Threat was cleared would work with W. H. and K.M. to determine if any product had been affected and proceed as needed. Identification of Affected Product: Initially all product would be placed on hold until threat was cleared and then the team would evaluate product on case by case basis. All partially, loaded trucks/boxcars and dry vans would need to be placed on hold and held on site until they could be evaluated. Evidence of the training in Local Crisis Management was reviewed, date: 8/21/23.

2.6.4.1 A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum:
i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident;
ii. The nomination and training of a crisis management team;
iii. The controls implemented to ensure any responses do not compromise product safety;
iv. The measures to isolate and identify product affected by a response to a crisis;
v. The measures taken to verify the acceptability of food prior to release;
vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;
vii. Sources of legal and expert advice; and
viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.4.2 The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1 **Food Defense Plan**
Food Defense Plan, signed by Plant District Manager and Food Defense Coordinator, Date: 3/20/23. Plan contents: Facility Description, Food Defense Team & Training, Product / Process Description, Process Flowchart, Vulnerability Assessment, Mitigation Strategies, Change Log. Vulnerability Assessment Summary. Per the IA rule (21 CRF 121.130(a)), the site's vulnerability assessment considered the three fundamental elements: 1) Potential public health impact (e.g. severity and scale) if a contaminant is added, 2) Degree of physical access to the product, and 3) the ability of an attacker to successfully contaminate the product. First, the granulation process consists of a totally enclosed system with personnel monitoring their areas. The process involves extreme environments (e.g. very high temperatures and elevated pH levels) and a contaminant would be incapable of with-standing the food production process. Therefore, an intentional adulteration (including the possibility of an inside attack) Food Defense Plan Mini Cassia 10.5.2023. Threat assessment: after performing the threat assessment the site did not find any actionable point within the food defense plan. Food Defense challenge: 9/8/23 Mini: "At Mini-Cassia I was able to pull into the parking lot without issue, the security guard was not at the front gate... [...] Once inside the warehouse I was able to access all areas, like all our other facilities I interated with several employees, but no one stopped or questioned me. At the warehouse dock there was an open rollup door with a rail car there ahtat would provide another means of entrance. "

2.7.1.1 A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1.2 A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum:
i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;
ii. The name of the senior site management person responsible for food defense;
iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points;
iv. The methods implemented to protect sensitive processing points from intentional adulteration;
v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents;
vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and
vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1.3 Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1.4 The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2 Food Fraud

There is no historical evidence of substitution with other commodities. Sugar is a low-cost commodity and therefore there is no motivation for substitution. Due to periodic price differences between cane and beet sugar, thase products must be segregated to prevent substitution. FAcilities handling both in bulk are required to designate separate storage bins/silos to prevent co-mingling. Both products are handled on the same equipment and chageovers are required between products. There is no practical testing to differentiate between beet and cane sugar. Date: 02/22/2023.

2.7.2.1 The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.3 Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.4 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1 **Allergen Management**

5.16. Allergens & Sensitizing Agents. The Company ensures that all sugar products distributed to customers are compliant with the Food Allergen Labeling and Consumer Protection Act. Products are free of known allergens and contain sulfur dioxide levels less than labeling requirements. Partener facilities employe the following methods for allergen and sensitizing agent control: 5.16.2.1. Food Safety Plan and HACCP. 5.16.2.2 Allergen Exclusion: partner facilities do not process or handle knwon allergens. Designated eating & drinking areas: per Policy 5.3. Personnel Practices. Packaging: No packaging is stored in such a manner that could lead to contamination from allergens. Lubricants: lubricants that have the potential to contact food products are required to be food grade and allergen free per Policy 5.6. Facility and Equipment Maintenance.

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include:
i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens;
ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors;
iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known;
iv. A list of allergens that is accessible to relevant staff;
v. The control of hazards associated with allergens and incorporated into the food safety plan, and
vi. Management plans for control of the identified allergens.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.2 Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.3 Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.4 Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact.
Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.5 Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.6 Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.7 The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.8 The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.9 The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.10 Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.11 Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.1 Training Requirements

The site determines the training requirements based on a Corporate policy: 5.2. Employee Food Safety & Quality Training. 5.2.1. Purpose. The purpose of this policy is to communicate the requirements for assessing and implementing a training program with an emphasis on food safety and quality assurance. Training is required by food regulation and the system requirements. Minimum curriculum: Food Safety Policy Statement, Basic cGMP/housekeeping and FDA awareness, Food Defense and intentional contamination; HACCP awareness. They have different levels such as: Warehouse Helper level # 1, 2, 3. These levels include different competences and all of them pass through a test. Above this there is a Foreman and Senior Foreman. The auditor interviewed some people during the tour and required the evidence of the training of them: Packaging Technician and Foreman that tested the metal detection systems.

2.9.1.1 The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

RESPONSE: COMPLIANT

EVIDENCE:

2.9.1.2 Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2 Training Program

Facilities within the corporation employ general classroom settings, which may include the following methods for employee training: Presentation / video, retention testing with passing scores of 70%, signed or electronic attendance acknowledgement, further supervisor / manager observations of trading effectiveness. This is an annual scheduled for everyone. Sample taken: Boxcar Inspection and Loading, Kelly Ralph: 3/4/19.

2.9.2.1 A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with:
i. Implementing HACCP for staff involved in developing and maintaining food safety plans;
ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces;
iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment;
v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products;
vi. Environmental monitoring for relevant staff;
vii. Allergen management, food defense, and food fraud for all relevant staff; and
viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code.
The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.2 Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.3 Training records shall be maintained and include:
i. Participant name;
ii. Skills description;
iii. Description of the training provided;
iv. Date training completed;
v. Trainer or training provider; and
vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.1 **Premises Location and Approval**
Update Facility Registration / Reference Code: 12379031350: Amalgamated sugar Company Cooperative, 50 S 500 W, Paul, ID, 83347, USA. This is the FDA registration number. / No risks that may have and adverse impact on product safety were observed.

11.1.1.1 The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities.
The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2	**Building Materials** During the tour it was observed that the infrastructure in general is adequate to the nature of the product and process, floors, walls, celings, are in good maintenance.
11.1.2.1	Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.2	Drains shall be constructed and located so they can be easily cleaned and not present a hazard. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.3	Waste trap system shall be located away from any food handling areas or entrances to the premises. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.4	Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.5	Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.6	Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.1.2.7	Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.8	Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.2.9	Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5). **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.3	**Lightings and Light Fittings** Lighting is adequate for the process and products in the factory, in general is well iluminated, and the lights are shattered.
11.1.3.1	Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.3.2	Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.3.3	Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.1.4	**Inspection/ Quality Control Area** There is an on-site laboratory performing quality testing, not food safety, specially to assure the productivity of the factory. No risk posed to the product.
11.1.4.1	If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.5	**Dust, Insect, and Pest Proofing** The site in general is proofed against dust, insect and birds. It was reviwed that there was an incident in the warehouse that a bird could enter, but it was solved immediately and it was an isolated situation.
11.1.5.1	All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.5.2	External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.5.3	Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.6	**Ventilation** The site is very well ventilated. In fact the intial processes are open to the sky, which is normal in a sugar production factory.

11.1.6.1	Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.6.2	All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.6.3	Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s). **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.6.4	Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7	**Equipment and Utensils** Equipment and utensils are adequate, some of them are relatively old but still working and in adquate maintenance, and there is a plan for replacement that was reviewed by the auditor.
11.1.7.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.2	Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.3	Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment. **RESPONSE:** COMPLIANT

EVIDENCE:

11.1.7.4 Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.5 Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.6 Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.7 All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.8 Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.9 Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or
disposal of non-conforming equipment shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8 **Grounds and Roadways**
The plant is stand-alone in a rural part of California, the paths and ways are adequate for loading and unloading and to not present a risk for the product.

11.1.8.1	A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.8.2	Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.8.3	Paths from amenities leading to site entrances shall be effectively sealed. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1	**Repairs and Maintenance** 5.6. Facility and Equipment Maintenance, the company ensures that Partner Facilities take appropriate measures to prevent equipment and maintenance activities from becoming potential sources of contamination. Based on risk, quality requirements for maintenance are implemented in GMP-designated areas. The company recommends that Partner Facilities maintain local preventive procedures based on operations, equipment, and historial evidence. Register: Scheduled Preventative Maintenance On Major Equipment. Document 10.13.1-R-003. Last Reviewed: 10.7.2022. There is a classification of low, moderate and high risk activities, only low and moderate are considered. The department has changed in the last few years, there is a maintenance staff, there is a dedicated sugar mechanic, there are four shifts so they have people for providing the maintenance in all shifts. The focus is to provide more preventative maintenance. They started a work order program, they use a system for handling the activities. There are also emergency work orders. 210 days are for slicing, for sugar 11 months of the year production. They have 2 - 3 weeks for maintenance in the warehouse. By reviewing the corrective actions generated by customer audits, the auditor took a sample of one that required some kind of maintenance activity: Date 3.14.2023. Corrective action: 23.03. Description of problem: During McKee Audit it was discovered that paint was starting to gleke on white centrifugal # 8. Root cause: There is a lot of heat and steam in the area and can cause the paint to start peeling: ORACLE JD EDWARDS, example was taken: date: 3/29/23. Time: 8.35. Job is complete. There was a crack in a light. Worker order: 339239 Unscheduled inspection. WO closed. There are 120 people in the maintenance process. In the last 3 years they have been implemented a system for work order processing.
11.2.1.1	The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.2.1.2	Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.3	Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.4	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.5	The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.6	Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.7	Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.1.8	Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.2.2	**Maintenance Staff and Contractors** Maintenance personnel and contractors are trained on GMP and follow established GMPs when working in GMP-designated areas. Mechanics are included in annual GMP training as outlined in Policy 5.2. Employee Food Safety & Quality Training. Mechanics are instructed to report and document when performing maintenance in GMP areas and when maintenance activities present risks to food safety and/or quality. In addition, personnel performing maintenance on equipment in GMP areas maintain clean tools suitable for product contact equipment. The practitioner commented about the process when the external maintenance provided comes, i.e. welders: they attend a video for GMP training and fill some forms in regard to safety and GMPs prior to enter the facility. They hardly ever use contractors, specially when there is a new project of construction. In the warehouse there is a new construction. They have the modules for GMP for contractors, besides there is a senior former staff accompanying them during the work time.
11.2.2.1	Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3). **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.2.2	All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.2.3	Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.3	**Calibration** 5.5. Equipment Calibration: Food Safety. 5.5.1. Purpose. The purpose of this policy is to define the calibration program for equipment relating to food safety and Partner Facilities' Hazard Analysis and Critical Control Point (HACCP) programs. Related items include metal detectors, magnets, and temperature probes for wash bays. This policy doe snot apply to filters for liquid sucrose. 5.5.2. Policy. The Company and Partner Facilities install and maintain devices for food safety that include metal detectors and magnets. To ensure these devices are effective, Partner Facilities include calibration as pre-requisite program and periodically verify the effectiveness Metal Detectors: 4; 1 for bags en 3 for bulk. Auditor requested the certificate for Metal Detector for bag filling line: Mettler Toledo, certificated dated: 06-Feb-2023; In regard to scales, there are 4 that can be related to sugar. Track Scale - Test And Inspection Report, Date of Test: 08/28/2023. Insttument serial number: 174250761. Total capacity: 150 tons.
11.2.3.1	The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.2.3.2	Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.3.3	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.3.4	Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.3.5	Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.3.6	A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.4	**Pest Prevention** 5.4. Integrated Pest Management. The company and partner facilities ensure products are pest-free by implementing integrated pest management programs (IPM) at all production and storage facilities. IPM Programs include the use of contracted pest control service providers and proactive measures implemented by each facility or warehouse. Business license of the pest controller: SPRAGUE IDAHO BUSINESS LICENSE: idaho does not require pest control firms to acquire a pesticide business license. Idaho only offers individual pest control applicator licenses. For the techinicans: Casey Carpenter, License 61377, expires 12/23. Professional Applicator, Categories AF CO CP GP SP.There is a map locating the devices: updated 1/10/2022, no changes since then. They have different kind of traps: roden bait stations, exterior roden traps, interior rodent traps, insect light trap, insect sticky trap. Trend report for year 2023: There is a report of acticity in the exterior side of the facility: January, April, May with 1 catch, and in July 2. Chemical products that are used for pest control include: Advance 375A Granuar Ant Bait, Talstar P Professional Insecticide, Selonitra Roden Bait, Surekill SK 100.

11.2.4.1 A documented pest prevention program shall be effectively implemented. It shall:
i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program;
ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;
iii. Outline the methods used to prevent pest problems;
iv. Outline the pest elimination methods and the appropriate documentation for each inspection;
v. Outline the frequency with which pest status is to be checked;
vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map;
vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available;
viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station;
ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and
x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.2 Pest contractors and/or internal pest controllers shall:
i. Be licensed and approved by the local relevant authority;
ii. Use only trained and qualified operators, who comply with regulatory requirements;
iii. Use only approved chemicals;
iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices;
v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments;
vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and
vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.3 Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging.
Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.4 Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.6 No animals shall be permitted on-site in food handling and storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5	**Cleaning and Sanitation** 5.7. Cleaning, Sanitation, & Waste management. The company and partener facilities operate in an hygienic manner by designing, implementing, and documenting cleaning and sanitation programs. These programs are based on product risk and include documented SOPs/WIs, MSS, and verification practices. Facilities implement the following requirements when applicable: Non-GMP Area Cleaning, Dry Cleaning, etc. For the cabinet storing the chemical products they have the folling information: "Warehouse Approved Chemicals: this list includes the only chemicals allowed in this cabinet. If you have a chemical not on this list pleawe notify the Warehouse Manager, Sanitation Foreman, or Food Safety and Quality Professional for approval before storing it in this cabinet. " The list includes: Alochol, AOSafety/3M/Visionaid, Bleach, Dawn dish sopa, Diversey, Easy Pak Pods, etc.
11.2.5.1	The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.5.2	Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.5.3	Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.5.5	Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves. **RESPONSE:** COMPLIANT

EVIDENCE:

11.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations,
equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.8 Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.9 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.
A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1 **Personnel Welfare**
5.3. Personnel Practices. The Company Implements GMP practices to ensure compliance with food regulations and to protect our food products from adulteration. This policy outlines the personnel-related requirements of GMPs. Full implementation of this policy ensures that employees interfacing with product, packaging, or food contact surfaces do not become a source of contamination. 5.3.2. Policy. The Company implements GMP practices to ensure compliance with food regulations and to protect our food products from adulteration. This policy outlines the personnel-related requirements of GMPs.

11.3.1.1 Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed.

Code Amendment #1
A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE: Personal Health & Disease Control: The company restricts personnel suffering from communicable illness, infectious diseases, or who are carriers of infectious diseases from handling finished products or working in direct contact positions in GMP-designated areas. Facilities instruct personnel to report such conditions. The company grants supervisory personnel the authority to move employees with known signs of foodborne illness to non-GMP areas. Signs of foodborne illness are defined by the FDA.

11.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means.
In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2 Handwashing
Handwashing stations are strategically located along the facility, and are well equipped with supplies, and with the appropriate signage.

11.3.2.1 All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors:
i. On entering food handling or processing areas;
ii. After each visit to a toilet;
iii. After using a handkerchief;
iv. After smoking, eating, or drinking; and
v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2.2 Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2.3 Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with:
i. A potable water supply at an appropriate temperature;
ii. Liquid soap contained within a fixed dispenser;
iii. Paper towels in a hands-free cleanable dispenser; and
iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2.5 Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3	**Clothing and Personal Effects** There is a code for clothing in the plant which includes EPP like the use of protective glasses, earplugs, hairnets, beard nets, hats, vests, steeltoe shoes, etc.
11.3.3.1	The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.2	Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.3	Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.4	Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.5	Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.6	Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.3.7	Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.8	Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4	**Visitors** Visitors are invited to sign-up the visitors register, are checked for personel ID and instructed to follow the GMPS.
11.3.4.1	All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing and handling areas or shall be escorted at all times in food processing, handling, and storage areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4.2	All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5	**Staff Amenities (change rooms, toilet, break rooms)** The auditor confirmed during the tour that the staff ammenities are adequate due to the type of process, products, number of personnel working in the factory, etc.

11.3.5.1	Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.2	Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.4	Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.6	Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.7	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.8	Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.3.5.9 Separate break rooms shall be provided away from food contact/handling zones.
Break rooms shall be:
i. Ventilated and well lit;
ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting;
iii. Equipped with a sink serviced with hot and cold potable water for washing utensils;
iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and
v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1 **Staff Engaged in Food Haldning and Processing Operations**
The design of the site is in such a way that does not allow the cross contamination of the products, in fact they have devided the are into GMP and non GMP zones.

11.4.1.1 All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices:
i. Personnel entry to processing areas shall be through the personnel access doors only;
ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging;
iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor;
iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and
v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1.2 Personnel working in or visiting food handling or processing operations shall ensure that:
i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4;
ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food;
iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed.
iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed.
v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1.3 The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1	**Water Supply** There are 3 wells in this facility. The well water is used for cleaning and sanitation. The raw material (beet) is above 90% water, so the water that is being used in the process comes from the beets. By the way, they irrigate the nearby lands with the water produced in the factory.
11.5.1.1	Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1.2	Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1.3	Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1.4	The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1.5	The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1.6	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.2	**Water Treatment** There is a basic treatment about chlorine: Just a chlorinating system.

11.5.2.1 Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment.
Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2.2 Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2.3 Treated water shall be regularly monitored to ensure it meets the specified indicators.
Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits.
Records of testing results shall be kept.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.3 Water Quality

Magic Valley Labs, Collection Date: 9/26/2023, Received Date: 9/26/2023. Collection Time: 11.56 AM, Received Time: 4.12 PM, Tempered Wash Water. The testing report includes: Nitrate, Barium, Cadmium, Mercury, Antimony, Arsenic, etc. All the results within the limits. Total coliform: absent; Escherichia coli: absent. Completed date: 9/27/2023. This laboratory is accredited by the State of Idaho Certificate for the Microgiological Analysis of Drinking Water Magic Valley Lab., Inc., 2010 Addison Avenue Twin Falls, ID 83301 EPA ID00911. Based on the most recent assessment, proficiency testing results and continuing compliance with the EPA (815-r-05-044) "Manual for the Certification of Labotarories Analyzing Driking Water" with addendums and IDAPA 16.02.12, Magic Valley Lab. is certified for environmental monitoring under the Safe Drinking Water Act and authorized to performe the analytes listed: total coliform, E. coli, etc. This certification is in effect through December 31st, 2023.

11.5.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for:
i. Washing, thawing, and treating food;
ii. Handwashing;
iii. Conveying food;
iv. An ingredient or food processing aid;
v. Cleaning food contact surfaces and equipment;
vi. The manufacture of ice; or
vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.3.2 Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.3.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.4 Ice Supply

No ice is used in this site.

11.5.5 Air and Other Gasses

No compressed aire or other gasses are used in direct contact to product.

11.6.1 Receipt, Storage and Handling of Goods

Inspecting & Receiving Packaging Material, Document No. 10.8.4-S-002. The purpose of this procedure is to outline the proper methods to use when inspecting incoming packaging materials and their proper storage requirements. This procedure applies to all packaging material that is received at the Mini-Cassia Factory. This procedure includes: FIFOR metdhod, Responsibilities. Inspections: each pallet of packaging and the trailer should be inspected for any evidence of pest contamination, debri, excess dirt, water damage, or any other contamination.

11.6.1.1 The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.2 Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.3 The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.4 Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.2	**Cold Storage, Freezing and Chilling of Foods** No cold storage, freezing or chilling of foods are used in this site.
11.6.3	**Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods** Storage of dry ingredients, packaging materials, and other aids of processing is adequate for the nature of the products being manufactured and the processes.
11.6.3.1	Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.3.2	Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.4	**Storage of Hazardous Chemicals and Toxic Substances** Chemical products are handled adequately. For instance in the maintenance workshop they have the lubricants and they are under control. There are chemicals used as aids of process and they are adequately stored. The auditor interviewed the janitorial personnel at the chemical storage room for cleaning and sanitation and found that they are well instructed and the chemical products were stored adequately.
11.6.4.1	Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.4.2	Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.6.4.3 Hazardous chemicals and toxic substances shall be correctly labeled and:
i. Used only according to manufacturers' instructions;
ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-inprogress, finished product, or product contact surfaces;
iii. Returned to the appropriate storage areas after use; and
iv. Be compliant with national and local legislation.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.4 Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.5 Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,:
i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use;
ii. Be provided first aid equipment and personnel protective equipment (PPE); and
iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.6 The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are:
i. Not reused;
ii. Segregated and securely stored prior to collection; and
iii. Disposed through an approved vendor.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.7 In the event of a hazardous spill, the site shall:
i. Have spillage clean-up instructions to ensure that the spill is properly contained; and
ii. Be equipped with PPE, spillage kits, and cleaning equipment.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.5	**Loading, Transport, and Unloading Practices** 5.11. Bulk Sugar Railcars, The company transports granulated sugar via bulk rail by utilizing gravity pneumatic hopper railcars and pressure differential (PD) railcars. Partner facilities ensure that loading facilities, railcars, loading equipment, and loading practices do not cause product contamination or degradation by meeting the following requirements: documented procedures and work innstructions; dedicated fleet: the company maintains a fleet dedicated to sugar for rail transportation. Railcars are washed when cars enter sugar service. From the AS 400 system, following the trace exercise: 11/15/23, From Lot Number: AR23312, Order # 2193774. Trans Qty User: 800.00.
11.6.5.1	The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.5.2	Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.5.3	Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.5.4	Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.6.5.8	Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.1	**High-Risk Processes** There are no high-risk processes in this site.
11.7.2	**Thawing of Food** No thawing of food in this site.

11.7.3	**Control of Foreign Matter Contamination** 5.9 Physical Contaminant Control. The Company and Partner Facilities' physical contaminant control program minimizes risks of foreign matter contamination to ensure that final products are free from extraneous materials. This program contains methods for prevention, monitoring/control, and instruction for reporting potential contamination incidents. This program fuctions in conjunction with Facilities' hazard analysis and critical control point (HACCP) plans. Glass, brittle plastic, and ceramic: glass, brittle plastic, and cerammic is virtually undetectable in non-liquid products. To minigate risk of glass contamination, facilities implement exclusion, monitoring, and reaction techniques. Sample of the inspection / maintenance interventions was taken: Date 3/31/2023, Time: 9:40. Note: Replace plastic light cover at the bottom of silo # 6.
11.7.3.1	The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.2	Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.3	Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.4	Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.5	In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, thoroughly inspected (including cleaning equipment and footwear), and cleared by a suitably responsible person prior to the start of operations. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.7.3.6	Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.7	Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.8	Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.3.9	Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3). **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4	**Detection of Foreign Objects** The sensitivity of the metal detectors is verified using 1.5 mm ferrous, 1.8 mm non-ferrous, 2.0 mm stainless steel and 2.0 mm aluminum test standards. Metal detectors are equipped with automatic rejection devices. The rejected material is then examined to determine type and source of contaminant. During the tour the auditor could verify the functioning of the metal detection systems and they were found to work accordingly.
11.7.4.1	The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4.2	Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4.3	Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected. **RESPONSE:** COMPLIANT

EVIDENCE:

11.7.4.4 Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.5 In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1 **Waste Disposal**

5.7. Cleaning, Sanitation and Waste Management. The company and partner facilities operate in an hygienic manner by designing, implementing, and documenting cleaning and sanitation programs. Waste management: facilities control and mmonitor waste to ensure waste is conveyed, stored, and sicarded in such a way to minimize the development of odor, pest attractant, hadborage, and to protect against contamination of product, product contact surfaces, water supplies, and ground surfaces. Facilities implement the following to ensure that waste does not affect product quality or sfaety: Waste receptacles: waste bins are only used for their intented purpose. Waste sugar: facilities dispose of sugar found to be unfit for reprocessing as standard waste. e.g. landfill. Waste revmoval documentation: faciliteis incorporate waste removal into local MSS. Contractors removing waste are subject to Facilities Supplier Approval program to ensure that contractosr meet local regulations for disposal. Waste monitoring: facilities include waste removal into facility inspections and/or daily hygiene inspections.

11.8.1.1 The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.2 Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.3 Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.4 Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.5 Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.6 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.7 Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

RESPONSE: COMPLIANT

EVIDENCE: The site manufactures animal feed, but this is not within the scope of the SQF systems.

11.8.1.8 Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.9 Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.10 Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

RESPONSE: COMPLIANT

EVIDENCE: