



SQF Food Safety Audit Edition 9

The Amalgamated Sugar Company, LLC - Twin Falls

Summary

AUDIT DECISION

CERTIFIED

CERTIFICATION NUMBER

6211 | 310111

AUDIT RATING



Excellent

DECISION DATE

12/23/2023

AUDIT TYPE

UNANNOUNCED

RECERTIFICATION DATE

11/16/2024

AUDIT DATES

12/04/2023 - 12/05/2023

EXPIRATION DATE

01/30/2025

ISSUE DATE

12/23/2023

Facility & Scope

The Amalgamated Sugar Company, LLC - Twin Falls

2320 Orchard Drive East
Twin Falls Idaho 83301
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: César Hernández (120868)

Hours Spent on Site: 16

Hours of ICT Activites: 0

Hours Spent Writing Report: 8

Non-Conforming

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 functions in conjunction with Facilities' hazard analysis and critical control point (HACCP) plans. Glass, brittle plastic, and ceramic: glass, brittle plastic, and ceramic is virtually undetectable in non-liquid products. To mitigate risk of glass contamination, facilities implement exclusion, monitoring, and reaction techniques. / NCM: During the tour of the warehouse, the floor had several wet spots, which were caused probably by a leak, at least one of which caused a wooden pallet to get wet. Although no affected product was found, the situation creates a risk if it is not corrected.

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: MINOR

EVIDENCE: NCM: During the tour of the warehouse, the floor had several wet spots, which were caused probably by a leak, at least one of which caused a wooden pallet to get wet. Although no affected product was found, the situation creates a risk if it is not corrected.

ROOT CAUSE: Moisture migrated from the outside through multiple cracks in the foundation. It was determined that water was pooling outside the building due to lack of proper drainage.

CORRECTIVE ACTION: Currently to mitigate the issue we have added to the MSS a daily inspection of the area and have instructed employees to clean up any water in the area in a timely manner. Long term we are working with a construction company on installing gutters and potentially French drains to pull water away from the building. They are scheduled to review the building on 12/18/23. And once the walls are dry coating the walls with a liquid rubber as an added protection.

VERIFICATION OF CLOSEOUT: The site is giving the proper information about the situation, with a short term correction and a long term solution that implies infrastructure improvements.

COMPLETION DATE: 12/18/2023 **CLOSEOUT DATE:** 12/21/2023

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner RESPONSE: CALISTA NEWMAN
SQF Practitioner Email	Email of the designated SQF Practitioner

RESPONSE: CNEWMAN@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: TRAVIS FRIES: WAREHOUSE MANAGER, CALISTA NEWMAN: SQF PRACTITIONER, IAN KIHARA: PLANT MANAGER, JEREMY ADAMSON: DIRECTOR OF QUALITY ASSURANCE, KELLY MALONE: QUALITY ASSURANCE MANAGER, 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: FACILITY DESCRIPTION: THE TWIN FALLS FACTORY WAS CONSTRUCTED IN 1916. IT IS ONE OF THREE FACTORIES LOCATED IN IDAHO THAT PROCESSES SUGAR BEETS. THIS FACILITY PRODUCES GRANULATED SUGAR WHICH IS CONDITIONED AND STORED IN SEVEN BULK SILOS. STORED SUGAR IS SCREENED AND PACKAGED INTO BULK CARS AND TRAILERS OR PACKAGED INTO FLEXIBLE INTERMEDIATE BULK CONTAINER (FIBC) TOTES. TOTES ARE SHIPPED VIA TRUCK OR RAIL TO DISTRIBUTION SITES OR DIRECTLY TO CUSTOMERS. EMPLOYEES 350 - 400 DEPENDING ON SEASON. 400,000 SQF. PRODUCTION SCHEDULE: 5 SHIFTS, 1 ROTATING SHIFTS FROM MONDAY TO FRIDAY, AND THE REST FOR THE WEEK 24/7. DURING THE AUDIT A TRACE EXERCISE WAS PERFORMED: FOR THE PRODUCT THAT HAS BEEN USED AS TRACE EXERCISE: LOT # AMT1231220TB, IRMS/GCAS # 10048503.

Closing Meeting People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

RESPONSE: TRAVIS FRIES: WAREHOUSE MANAGER, CALISTA NEWMAN: SQF PRACTITIONER, IAN KIHARA: PLANT MANAGER, JEREMY ADAMSON: DIRECTOR OF QUALITY ASSURANCE, KELLY MALONE: QUALITY ASSURANCE MANAGER, LUIS PALACIOS: SQF AUDITOR.

Auditor Recommendation Auditor Recommendation

RESPONSE: PROCEED WITH RECERTIFICATION. PLANT NEEDS TO SOLVE THE MINOR NC RAISED DURING THE AUDIT.

2.1.1 Management Responsibility

There is a culture survey. They have been trying to reach more about individual being assigned for inspecting purposes, for instance the mechanics. Posting weekly food safety items in the TVs and the news letters. Feedback: the site is getting a lot of more of suggestions in generic concepts. The effect has been in general terms the culture is affecting in a good way all the systems not only food safety, but environment, safety, etc. The auditor reviewed a weekly report: Report from Miss Tayler McCarty, safety manager, dated 11/27/2023: here is the employees suggestion list: auditor took one sample: 11/10/2023: not enough seating in the break room, complications with cleaning underneath tables causing back pain. Remove current tables/benches and replace them with round tables and single chairs. This will make cleaning underneath tables easier and provide more seating/space. Solutions and updates: has been added to HR's remodel list, status: in progress. Good news about the surveys: 2021 total turned in surveys 36, 2022: 99, 2023: 107. After performing the survey they realized they have some lacking in training, so they are focusing on this topic. Also informing more the people about complaints, audit results, etc. Corporate Standard Operating Procedure / Job Descriptions & Additional Food Safety Responsibilities: Document No. 3.5-01, 8.0 Organization Chart as of 01/06/2023. The Food Safety & Quality Professional (Quality Assurance / Program Manager) reports directly to the Quality Assurance Manager (audits / customer satisfaction / regulatory), and she reports directly to the Vice President of Commercial Strategy (Leadership / Resources). The primary Practitioner accredits several training certificates: FSPCA Preventive Controls for Human Food, 07/28/2016; University of Idaho, Introduction to Food Safety and HACCP Workshop, September 17, 2013. / Back up practitioner also accredits the same certificates. For HACCP training: AIB International HACCP online, 24-dec-2019.

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 blackout dates were identified for this current unannounced audit.

2.1.2 Management Review

2023 NSM & Partner Food Safety & Quality System Review, Meeting Date(s): August 15th - 16th, Meeting Location: Salt Lake City, UT. Attendance: a number of managers, including Miss Calista Newman (SQF Practitioner), Travis Fries (Warehouse Manager). Date: 9/28/2023. Objective: The purpose of this meeting was to conduct an annual review of the standardized portion of our quality assurance program and identify focus areas and goals for the next year. This meeting covered several current topics and spotlighted the developed food safety policies to be shared between Partners to harmonize quality assurance programs. Topics: NSM Revised Business & Partnership Overview, Regulatory Updates, Recalls, Action Items from Last Meeting, Packaging Material Coordination and Document Registers, New Railcar Lease and Inspection Protocols, Customer Complaint Trends and Issues (Top 5 or 6 Issues), Policy Manual Review, RCA/5 WHY Expectations, Hazard Analysis Update. Some policies were updated at the corporate basis, for instance: Traceability: The group will attempt to standardize the traceability cover pages. There will be a review set up after all the forms are completed. The success criterion for a packaging trace needs to be reworded to identify all shipped product rather than a mass balance since waste is not monitored. This would include things like check the outbound shipments and verify that no more of that lot of packaging was still onsite, or if so, accountable. // Besides the Corporate meeting - review, there is a site's specific management review: Annual Food Safety Management Review, Information covered will be from 9/1/22 - 8/31/23 (Crop year). Incidents: There has been a total of 53 incidents this crop year: 25 physical, 6 chemical, 4 biological (blood), 6 paperwork, 8 other. Repeated incidents: 5 Missed metal detector tests (were not done on time or after a long break), 5 food/allergens brought into GMP zones, 4 Pest related including animals getting into GBMP zones. // Monthly meetings were also reviewed: sample June: Monthly Management Update: Follow up items from last meeting: replace the man door from the warehouse to the bulk loading barn with a standard door as the current one falls off the track in is difficult to open and close. Will need to ensure orientation of door will not pose safety risks. The bulk tunnel train door replacement still needs to be ordered. Ordered on 7/14/2023, promise date: 10/20/2023. Another sample taken: October. The meeting minutes were available.

- 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. Customer Complaint Trend Analysis Summary. 2023. Overview: Total number of shipments: 3,642, Total CWT: 4,330,233. Order/Shipment Success Rate: 99.863%, Percent w/errors: 0.137%, Total complaints: 5, Total complaint cost: USD 42,440.16. Complaints categories: all of the are quality issues, not food safety complaints. Two of them were related to operators errors. For instance: file 40, form: C233082, Date received: 08/03/23. Broad category: Quality. Specific Category: Operator Error, employee. Issue description: A tote did not have a tote tag attached and is being rejected. Due to specialized placarding, original tags must be replaced with Perrigo-specific tags. Information and seals records were provided to Perrigo to prevent tote reject but were not accepted by Perrigo's quality team.

- 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 Twin Falls is storing its food safety and quality assurance documents in electronic database. This makes it easy to share and access documents from anywhere. ASC Twin Falls 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. During the audit the auditor requested several records that were available accordingly.

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 Granulated 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, dairy products and fermentation. 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, second party lab, paperless program, transport bulk sugar to customers, recycle poly bags and cardboard, 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, referred to: US FDA 21 CFR 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: Contract Service Provider Specifications last updated/reviewed 10/13/23. This register includes: Transportation: transports bagged sugar. Provide clean, food ready dry van trailers. Contract on file: Company C.H. Robinson; provides rail service to transport bagged and bulk sugar: Union Pacific Railroad. Pest Control: Sprague. Trash collection: Western Waste Services. Required to dispose of waste in accordance with state and federal laws. Laundry and Uniform: Contractor Safety and GMP training required for employees onsite. Evidence of the GMP training for the person that comes from the company Cintas, Mr. M.B, was reviewed by the auditor. It is remarkable that there is an orientation training year after year, and the evidence is from year 2019, 2020, 2021 and 2022.

- 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.

- 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: Food Safety & Quality Assurance Manual, 5.18.2.5. Emergency Receipt from Non-Approved Suppliers: Receiving products supplied from unapproved suppliers is only permitted during emergency situations provided facilities notify quality assurance and obtain and review current, third 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: Supplier evaluation, Name of Supplier: Material Motion, Type of Supplier: Packaging, Product: super sack (Tote), Packaging / Ingredient used at: Nampa, Nyssa, Twin Falls, On time delivery: yes, Any complaints for the year: No, Competitive pricing: yes, Food Safety Audit On file and Audit certificate on file: yes. Evidence of the Food Safety Certificate (BRCGS issued by Intertek Certification Ltd, expiration date: 11 Jan 2024). There is also evidence of the food safety audit report, issues by Intertek, site name: Big Bags International.

- 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: Material Motion, December 29th, 2022. Continuing Guarantee & Regulatory Compliance Letter. Material Motion, Inc. Supplies only FDA compliant materials, and MATERIAL MOTION, INC. Requests from every supplier a Letter of Guarantee for each food contact substance and material provided to vendor. Material Motion, Inc. requests written assurances from suppliers demonstrating satisfactory food safety inspections and audits.

- 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:

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: The explanation from the corporate basis is that they have all the supplier information such as Third party audit report, third party certificate, letter of guarantee, specification, supplier evaluation; if there is a need to visit a supplier due to certain situation they can do this, but haven't done recently, no need for auditing a supplier on site recently.

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 established: Parameter: Sulfur Dioxide (SO₂), Specification: ≤ 6, Unit of measure: ppm (mg/kg), Test methods(s): titrimetric, COA: No. Auditor review sample reports retrieved from the electronic system and they were within the parameters. 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 initial 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

Pre-requisite programs within the Food Safety Plan are: 1. Employee Training, 2. Personnel Practices, 3. Integrated Pest management, 4. Equipment calibration, 5. Facility & Equipment Maintenance, 6. Cleaning & Sanitation, 7. Water & Air Programs, 9. Product Storage & Warehousing, 10. Sanitary Transportation, 11. Allergen & Sensitizing Agents, 12. Chemical Control & Approval, 13. Supplier Approval, and 14. Visitors.

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 requirements 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. Technical 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 standards for use in carbonated beverages and canned foods. Process Flowcharts: Beets to 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 beginning of a startup, a shutdown of two hours or longer, at the end of a production run (no following shift), and at least every 1.5 on the Concetti. Bulk detectors are tested after each vessel. Who: trained warehouse operator. Records: 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.

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: Twin Falls Facility, Food Safety Plan, Document No. FSP-06, Version 9/28/23. Granulated sugar. Plan contents: Facility & Food Safety Information. Product Description: Granulated Sugar. Flow Diagram: Beets to fillmass. Flow Diagram: Granulated. Process Preventive Control: Metal Detection Summary. Amendments & Training, Corporat Recall Plan.

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: Plan Approval: Plant Manager, Date: 9/28/2023; Local HACCP Coordinator: Date: 9/28/2023. / Team: Plant Manager, Warehouse Manager (PCQI), Sr. Warehouse Foreman (PCQI), Factory Lab Supervisor, Assistant Production Manager, Day Mechanical Supervisor, and Food Safety & Quality Professional.

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: Products: Granulated Sugar. Ingredients/Raw Materials: Sugar Beets. Packaging: Tote (Flexible Intermediate Bulk Container).

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: Product name: Granulated Sugar. Technical Name: Sucrose. Product Description: Sucrose is a nonreducing disaccharide composed of glucose and fructose bonded by an oxygen atom. It is derived from sugar beets or sugar cane and is used as a food and a sweetener. Ingredients: Crystalline sucrose. FDA classification: GRAS 21 CFR 184.1854. Distribution: Granulated sugar is distributed in bulk or packaged form. Bulk sugar is transported by bulk rail or truck. Packaged sugar is distributed by trailer or boxcar. Water Activity (aw): 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 standards for use in carbonated beverages and canned foods.

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: This product is used as an ingredient in many food products and functions as a sweetener. Intended consumer: Granulated sugar is sold at retail or distributed to food processors that provide products to the general public, including high risk groups.

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: Sugar beets - beete receiving - Beet flume - Debris removal - beet washing - Beet slicing - cossette weighing & belt - cossette mixer - difussion - serial liming & heating - carbonation & clarification - juice filtration & softening - sulfitation - evaporation - high melter - standard liquor filtration - crystallization: white pan. The flow diagram continues: this includes: inventory magnet; tank magnets, CCP metal detection for totes and bulk sugar. Finishing in transport.

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: The site performed the Preventive Controls evaluation, and determined the following: Process control: CP metal detection; Allergen control: none, Sanitation control: none, Supply-chain control: none.

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: Most significant hazard identified are metal particles due to the equipment and production environment.

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: The control measures magnets and metal detectors.

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: Process control step: CCP Metal Detection (Tote line & Bulk Metal Detectors), hazard: metal

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: Parameters values: functioning metal detector that can detect 1.5 Fe, 1.8 NF, 2.0 SS, and 2.0 Al mm spheres.

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: What: all products passes through an operating metal detector; how: monitor according to SOP 5.21-01 CCP Monitoring Metal Detector; Frequency: Conduct the inspection at the beginning of a startup, a shutdown of two hours or longer, at the end of a production run (no following shift), and at least every 2.5 hours of operation. Bulk detectors are tested prior to starup and after each vessel. Who:: trained warehouse operator.

- 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: Auditor reviewed the records for the Bulk Loading Metal Detector, when a metal particle was found. There are several records: 10/24/23, 10/26/2023, 10/30/23.

- 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: Evidence of the training of the CCP monitor was also reviewed: Employee number 591665, station training verification: bulk loading: cleaner. Date: 10/23/23.

- 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: Corrective action: operator notifies supervisory personnel. Supervisory personnel complete corrective action according to SOP 5.21-03 HACCP Deviation for Metal Detector.

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

RESPONSE: COMPLIANT

EVIDENCE: Monitoring activity: supervisory personnel verify the monitoring activity through record revdiw within 7 days of record generation. The review is indicated by a signature and date. / Food Safety Plan is incorporated into annual internal audits.

- 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. Allergen control: none, Sanitation control: none, Supply-Chanin control: none.

2.4.4 Product Sampling, Inspection, and Analysis

There is a proficiency testing for the laboratory technicians. For instance: Lab location: Twin Falls, Analyst: Andre Colon. Date: 1/13/2023. For all the quality parameters the result was: PASS. For instance: SO2: analyst results: 3.08; proficiency comparison: 1.13. Acceptable variation: lower than 5 ppm & higher than Central Lab. Another technician: Lupe Urias. SO2: 1.70 versus 1.19. Ralph Mumm: SO2: 2.40 versus 1.19. / Third party lab reports are also available, for instance: Magic Valley Labs, Collection Date 8/29/2023, Centrifugal Wash Water. Total coliform SM9223BQT Result <1 date analyzed: 8/29/2023. This laboratory is accredited by the Star of Idaho Drinking Water Certificate, effective date: 1/01/2023 - 12/31/2023. Certification authority for the State of Idaho. Quality Manual, 6.2.2.4. Sample Retain Requirements: Granulated: retains for granulated sugar are collected as one per daily lot number at a minimum. Facilities packaging Baer's Special will also collect a separate retain. Granulated retains are held for the shelf life of the product. Auditor requested to actually retrieve the retain samples from the warehouse: they had 5 bags of the same lot: TEVA SAMPLES, Date: 11-15-23, Lot #: AT233119, Customer #: 10337111, Cust Name: TEVA, Request #: 1652640, Resource #: 0422205TUV, Silo # 2.

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:

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: Records of non-conforming products were reviewed by auditor: PI013R1, Warehouse: 06, Resource: 800000, Class: RS, Description: Residual Sugar, Loc Num: C01, Last date received: 12/04/23. It was because the auditor observed a sugar powder product stored at the warehouse and it was explained that this was a non-conforming product that was about to send back to Nampa site for certain sort of reprocess.

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. For the product that has been used as trace exercise: Lot # AMT1231220TB, IRMS/GCAS # 10048503, the releasing process implies the laboratory report: Date: 11/16/23, Customer # 10407103, Manufacturing date: 04/30/23, Resource Number: 042205TVW, 1000 kg Bakers Tote, Lot Number AT23120B, result name: +050: 0.8 %, +100: 84.2%, +140: 95.8%, SO2: 2.85 pp.

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: General. Control Information. Element: Environmental Monitoring Exemption. Review Date: 02/24/2023. General Information: Policy: Risk Analysis. Purpose: To formally document and evaluate risks associated with environmental pathogens. It is concluded, through testing and peer reviewed journals, that environmental pathogen testing is not required for sugar products. Risk evaluation: Overview: Currently NSM (National Sugar Marketing) and partner facilities do not perform pathogen monitoring due to sugar being classified as a low-risk product. Pathogen testing is only conducted on a case-by-case basis through customer request and approval. The information provided below was considered when determining this stance. Microbiological: One key factor in microbial activity and pathogen growth is water activity (aw).

2.5.1 Validation and Effectiveness (Mandatory)

Validation for food safety plans: Element: Metal Detection as a Critical Control Point. Revised/Review Date: 01/03/2023. Validation Frequency & Type: Reg. Ref. 21 CFR 117.160(B). 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. There have been documented complaints for metal in sugar products, but these are typically sizes less than detectable limits (<2 mm). There are non-hazardous sizes as recognized by the FDA. It is also recognized that metal detectors are not a 100% assurance and factors may

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 activity: Supervisory personnel verify the monitoring activity through record review within 7 days of record generation. The review is indicated by a signature and date. 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.

- 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

Internal Audit Report: Audit Performance Metrics: Scoring: 96.39%, Percentage Complete: 100.00%, Exemplary 3, Fully Compliant 254, Partially Compliant: 22, Area Needs Improvement: 9, Not Applicable: 49, Not Scored: 10, No. of Questions: 347. Documentation Audit Date: 08/23/23, Inspection Audit Date: 09/13/23. Exemplary elements (those that are a strength in the system) were related to training: Personnel practices: employee interviewed understands foundational requirements for personnel practices. The auditor asked to review the evidence of the action plan of one of the findings, as a sample: Dat 10/9/23, Corrective action No. 23-16. Description of the problem: sugar was built up on the catwalk and there is water leaking down near the upper catwalks. Root cause determination: Sugar buildup is from KCVR-17 (South bulk scroll) has excessive movement causing the sugar to back up into the trays and the trays for the magnets to fall out onto the catwalk and spill sugar. Water leak is from a drain line not properly sealed. Preventive action determination: There are currently work orders to repair both issues. #357922 & 357918. Until then the issues will be mitigated by covering sensitive areas and cleaning regularly. All internal auditors are training and certified. The auditor took a sample for the lead auditor, in this case Miss Lacey Messing. Certificate of Internal Auditor Training, Internal Auditor Training, January 11, 2013. Scope: Internal Auditor Curriculum and Practicar Exam.

- 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. The auditor was using a sample for trace exercise: Lot # AT23319, UR #: 1283418, Package Id # P36047-19, Location: 21-A. Sample Lot: AT23120B. Filled by: Joe, Dave. The auditor required the managers to allocate in the system the date that they received the packaging material used for packing this particular product: Date: 4-5-2022, time: 11.00 am, From: Peasely. Inspection Report for Incoming Totes.

- 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.

- 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. Mock Recall report: Recall Exercise Status Report. August 02, 2023. Scope: Twn Falls Mock Recall will include the lot identified, product loaded and customer who recieved the product. Summary of activities: The test was initiated through an email at 9:58 AM. Calista Newman (Twin Falls) conducted the trace and submitted the documents through email. Record review on August 02 was completed by Lacey Messing and assisted by Kelly Malone (Boise). There were six findings throughout the mock recall. The mock recall was conducted on Granulated Sugar Totes and Rail Car lot # AT23180 produced on June 29, 2023. Scenario: Customer notified NSM of a clump in the sugar received in. It appears the clump is a pinkish color. Product was AT23180. Conclusion: Recovered 100% of granulated sugar product. Will need to update the Quantity produced total from 8,588.30 CWT to 8,257.55 CWT for the product affected.

- 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. Situations considered: Contamination and/or recall, major equipment failure, power failure, exploding and/or fire, etc. Crisis Management Plan Testing. Date 9/25/2023. Crisis date: 7/21/2023. Description of the Crisis: A disgruntled contractor planted bombs in the front office and detonated them at 4.00 pm on Friday. Multiple individuals are assumed to be in the building and are incapacitated. This include the Plan Manager, Environmental Engineer, Assist. Production Manager, Tecnical Support Specialist, Network Engineer, and Food Safety & Quality Professional. / Actions to Address Crisis: Initial actions to address the crisis is to evacuate all personnel to an undisclosed location as there may be other explosives on site. Contact authorities and they will take over crisis. Affected product: Food Safety concerns were brought to Kelly Malone QA Manager via phone as the Food Safety & Quality Prfoessional was incapacitated. Dispoisition of affected product: move all current orders to sister facilities an remelt any exposed product.

- 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.

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: There is a documented CORPORATE SECURITY REPORT, Issue date: 11/11/22. Business Owner: District Safety Manager. Document Owner: Safety Director. Purpose and Scope: This procedure identifies the requirements for implementing Security Systems at all Amalgamated Sugar Co. LLC (Amalgamated) operating grounds: Nampa, Twin Falls, Mini-Cassia, Nyssa, Colorado Facilities, Portland, and Ogden. General Requirements: I. Identification Badge Requirements. Badge Identification will identify the employee through visual inspection and a badge system. II. Personal Access Control Requirements: Personnel access will be evaluated based on an individual's position status hierarchy. The employee's job description will determine the area of entry. III. Security Camera Control Requirement: video cameras will be located in areas of potential human safety, food defense, and food safety risks. Other locations may be determined by the sites with the approval of the site Leadership Group if they meet the requirements.

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: Twin Falls Food Defense Challenge. This is a description report from the person that performed the challenge: "I went to the local Home Depot in Nampa and purchased a plain hard hat, safety glasses, and a neon safety vest. This is the attire that can be seen by anyone who has parked across the street from one of the sugar factories and is attainable with minimal effort of cost. These items along with a normal shirt, jeans, and pair of boots would be outfit for entering each facility. 9/8/2023. The rail doors were open to the loading shed and I was able to enter warehouse via the loading dock. I waived and greeted several employees along the way".

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, these 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 changeovers 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. Partner facilities employ 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 known 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.

- 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

The required topics to be covered during the year include: Food Safety Policy Statement, Basic GMP, Food defense, SQF awareness, HACCP awareness, Record completion requirements, Allergen awareness, Chemical handling, Foods safety and quality incident notification, Pest control. Evidence of the training was reviewed, for Record Completion Requirements. Evidence of the attendance list and test was reviewed, includes: employee, job title, department, supervisor, crew number, module: Module 5: Combined Module Quiza, Category: Food Safety, training validation: 10/27/2023.

- 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

The State of Idaho does not require a license or permit to operate. On the other hand, the site has a FDA registration: 1489xxx176, Amalgamated Sugar Company Cooperative, 2320 Orchard Dr E, Twin Falls, ID, 83301, United States. The site location does not present a risk for the food safety.

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, ceilings, 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:

11.1.2.7 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

During the tour of the plant the auditor was able to confirm that the plant is well lit, all the lights were working properly. The lights are protected and no particular problems were found regarding lighting.

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 a laboratory for the inspection of raw materials and products. This laboratory is located in a suitable location, which does not represent a risk of contamination for the product. The tests carried out are mainly physical and some chemical.

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

All external windows, ventilation openings, doors, and other openings are effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors are effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests. Traps and baits are located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment, as it was confirmed by the auditor along the tour.

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

Adequate ventilation is provided in enclosed processing and food handling areas. Fans and exhaust vents are insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

- 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 adequate 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: There is a nice example of a purchase of a new equipment, in this case a Metal Detector, THS/FFV21 series, and evidence that quality department had a chance to participate in the decision of the purchase at the Capital Expenditures Authorization Form. Description: The Twin Falls Factory has a Safeline metal detector on the Tote loading line that is currently 20 years old. This piece of equipment has recently had an increase in issues.

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 located in the city of Twin Falls with no neighbors, 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

As part of the maintenance process, there is a checklist that is reviewed every day, Preventative Maintenance Inspection, Document # 10.5.1-REC-01, Revision #: 3, Rev. Date: 12/1/2021, 9 pages. The auditor reviewed the record dated: 8-17-2023. This form was filled by Mr. Florencio A., a mechanical technician, shift C. The maintenance process utilizes an ORACLE JD Edwards database for handling the orders, sample was taken: Active Work Order Backlog - Work Order - Manage PEELING & CHIP PAINT CENT AREA (341679). Order Number: 341679, Type: annual M & R work. Equip Style: Dldg-Rom, Factory ID Number: 24000, Brief Description: Peeling & Chip Paint Cent Area. Status: WO Closed.

- 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

Normally contractors are used for important project, not currently. All maintenance and other engineering contractors required to work on-site are trained in the site's food safety and hygiene procedures and also escorted at all times until their work is completed. Auditor reviewed the list of approved suppliers and there is a contract requirement to be trained and to attend the site's orientation sessions if they are required. Also the Practioner explained that at all times the contractors are "baby sitted" by a staff member. There are 265 contractors approved in Amalgamated Sugar company, for the whole corporation. Example: ATS Welding: Company Grade: A, HSE Questionnaire: Exceptional. Score: 100.00. There is a questionnaire on line and they need to go through this.

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

Auditor reviewed the records in regard to calibration activities: Equipment Calibration Record, Title: Magnet Pull Test. Each magnet bar is to be pulled tested 2 times using 1/2" test piece. Record average in space provided. Date: 5/22/2023. Records are available for: South Bulk Magnets. Spout # 1, # 2, # 3, # 4, # 5, # 6 and MD Magnet. For year 2023 they decided to have the support of an external provider, and the certificates were reviewed as well: Magnetic Products, Inc. certifies Steve Bonney as a Certified Magnet Auditor. This certification requires the completion of a 16 hour in person training course and field training with an MPI Certified Magnet Auditor. This certification is designed for industry professionals to train with the manufacturer to properly test, evaluate and recommend magnetic separation systems to maintain effective metal control programs. Certification Expiration Date: December 6, 2023. In regard to metal detectors, auditor took a sample for the Metal Detector Audit Performance Verification Document: Date: 5/25/2023. Gravvity Flow with Valve. Lice ID: CCP # 1, Serial No. : 35002020060, Product information: Product: Bulk Sugar, Product temperature: 65 oF. Product Test Specs: Fe 1.5, NFe 1.8, SS 2.0, Al 2.0. There is a blue log with all the certificcates of the rest of the equipment that need to be calibrated in the quality laboratory, for instance: Sieves, Balances, Moisture Analyzers, etc. Example<. W.S. Tyler: Certificate of Compliance, W.S. Tyler's commitment to deliver test sieves of the highest quality. Every month they verify scales by themselves, record reviewed: 8/28/23, 9/27/23, 10/30/23, 11/30/23.

- 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

SPRAGUE is the contractor for pest control. The auditor reviewed all the information at the company's portal. License of the technician: Idaho, Francisco Molina, License 74702 Expires 12/24, Professional Applicator categories CO GP. CO: Applicators Core Competency, GP: General Pest. There is a map locating all the traps, last approved on 9/11/2023. They have many different devices: rodent bait stations, exterior rodent traps, interior rodent traps, insect light traps, insect sticky traps, pheromone trap, snap trap, rodent ceiling trap, bird trap, Bio - ADU, and Rock Chuck Trap. Trend analysis report was reviewed by the auditor. Trend analysis in regard to rodent activity: in April 16, and May 14 catches. Chemical products are listed in the portal: Selontra Rodent Bait. EPA # 7969-382. SDS: BASF.

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 partner facilities operate in a 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.

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:

11.2.5.7 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.

RESPONSE: COMPLIANT

EVIDENCE: Food Safety Record, Ref. No. 7.2-REC-01, Daily Hygiene Inspection Report. Warehouse Inspection Report, Shift D, Date: 4-18-23, Day. Sanitation: Tote Filling Area. Bulk: 4) Is the bulk barn door closed when not in use? Out of service.

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: Visual inspection are the common method for verifying the effectiveness, the Practioner mentions that she inspects very ofter the cleaning activities and also take pictures when needed. Sample taken: Area: Foreman's office: Priority "C": general. Chemicals found in foreman's flammables cabinet are not on the approved chemical list for that cabinet. Needs added.

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: It is explained in the NSM + QA + Manual 2022 + Website: "5.3.2.7. Employees requiring medical alert jewelry, necklace below the shirt of bracelet, must communicate requirements to Human Resources for evaluation before accommodations can be made". 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: All visitors are escorted at all times in food processing, handling, and storage areas.

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 amenities 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:

- 11.3.5.10** Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site.

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1 Staff Engaged in Food Handling 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 divided the area 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

Drinking Water Branch, Water System Details. Water System No. ID5420001, Federal Type: NTNC, Water system Name: Amalgamated Sugar Twin Falls, Principal County Served: Twin Falls, Status A, Activity Date: 10-16-1991. Annual Operating Periods & Population Served: population served 460. They have a primary well, and also an Emergency Well, both approved by the local authorities.

- 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

The site has a chlorine water treatment system. Information about the monitoring of the chlorination activity was available: Cullinary Water Chlorine (g/ml), a graph for the whole year: from 1/23 to 12/23, and the values range from 0.0 up to 11.0 g/mL. Most common value was in the range of 0.5 - 4.0 g/mL.

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

Drinking Water Branch, Coliform / Microbial Sample Results, Water System No. ID5420001, this list displays results fo all microbial analytes for the last 2 years by default. Type: RT, Lab Sample No. 3012187601, Collection Date and Time: 10-17-2023, 09:40, Sampling point: 1, Sample location: Generic Sampling POI, Presence/Absence indicator: A, Analyte code: 3100, Analyte Name: Coliform (TCR), Monitoring Period Begin Date: 10-01-2023, Monitoring Period End Date: 12-31-2023, Laboratory: Magic Valley Labs Twin Falls. Accreditation: State of Idaho Certificate for the Microbiological Analysis of Drinking Water Magic Valley Lab. Inc., for total coliform, E. coli, 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 Twin Falls Factory. This procedure includes: FIFO method, Responsibilities. Inspections: each pallet of packaging and the trailer should be inspected for any evidence of pest contamination, debris, 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 confirmed that the chemical products are adequately stored locked in a separate warehouse.

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-in-progress, 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 instructions; dedicated fleet: the company maintains a fleet dedicated to sugar for rail transportation.

- 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 functions in conjunction with Facilities' hazard analysis and critical control point (HACCP) plans. Glass, brittle plastic, and ceramic: glass, brittle plastic, and ceramic is virtually undetectable in non-liquid products. To mitigate risk of glass contamination, facilities implement exclusion, monitoring, and reaction techniques. / NCm: During the tour of the warehouse, the floor had several wet spots, which were caused probably by a leak, at least one of which caused a wooden pallet to get wet. Although no affected product was found, the situation creates a risk if it is not corrected.

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: Glass and Brittle Plastic Inspection: Warehouse. Ref. No. 10.8.2-REC-03. Revision: 11. Inspected by: B. L. Date: 6-30-23. For instance in this report: Location: 4th Floor, Florescent Lights (4): 1 light out.

- 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: MINOR

EVIDENCE: NCm: During the tour of the warehouse, the floor had several wet spots, which were caused probably by a leak, at least one of which caused a wooden pallet to get wet. Although no affected product was found, the situation creates a risk if it is not corrected.

ROOT CAUSE: Moisture migrated from the outside through multiple cracks in the foundation. It was determined that water was pooling outside the building due to lack of proper drainage.

CORRECTIVE ACTION: Currently to mitigate the issue we have added to the MSS a daily inspection of the area and have instructed employees to clean up any water in the area in a timely manner. Long term we are working with a construction company on installing gutters and potentially French drains to pull water away from the building. They are scheduled to review the building on 12/18/23. And once the walls are dry coating the walls with a liquid rubber as an added protection.

VERIFICATION OF CLOSEOUT: The site is giving the proper information about the situation, with a short term correction and a long term solution that implies infrastructure improvements.

COMPLETION DATE: 12/18/2023 **CLOSEOUT DATE:** 12/21/2023

- 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.

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 monitor waste to ensure waste is conveyed, stored, and discarded in such a way to minimize the development of odor, pest attractant, harborage, 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 safety: Waste receptacles: waste bins are only used for their intended purpose. Waste sugar: facilities dispose of sugar found to be unfit for reprocessing as standard waste. e.g. landfill. Waste removal documentation: facilities incorporate waste removal into local MSS. Contractors removing waste are subject to Facilities Supplier Approval program to ensure that contractors 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: