SQF Food Safety Audit Edition 9

Amalgamated Sugar Co. Nampa

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
6213 | 310112

AUDIT RATING
99
Excellent

DECISION DATE
12/23/23

AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
11/16/24

AUDIT DATES
12/06/23 - 12/08/23

EXPIRATION DATE
01/30/25

ISSUE DATE
12/23/23

Facility & Scope

Amalgamated Sugar Co. Nampa
138 W. Karcher RD.
Nampa Idaho 83687
United States

Food Sector Categories:
19. Food Ingredient Manufacturing

Products:
Granulated Sugar, Liquid Sugar, Powdered Sugar, Medium Invert.

Scope of Certification:
Granulated Sugar, Liquid Sugar, Powdered Sugar, Medium Invert.

Certification Body & Audit Team

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

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

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

Hours Spent on Site: 24
Hours of ICT Activites: 0
Hours Spent Writing Report: 8

Non-Conforming

11.1.2	**Building Materials** During the tour it was observed that the infrastructure in general is adequate to the nature of the product and process, floors, walls, celings, are in good maintenance. / NCm: in remelt room the juntions between floor and wall are not in good maintenance and are accumulating dirt.
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:** MINOR **EVIDENCE:** NCm: The SQF code requires that wall-to-wall and wall-to-floor junctions be designed to be easily cleaned and sealed. In remelt room the juntions between floor and wall are not in good maintenance and are accumulating dirt. **ROOT CAUSE:** The junction between the east wall of the remelt room and floor is believed to be due to normal wear and tear of the building structure from aging of foundation. **CORRECTIVE ACTION:** 1. Large crack in the juction was sealed to prevent dirt and sugar dust collection. 2. During internal audits the junctions will be monitored and any findings will be discussed in monthly management meeting's. **VERIFICATION OF CLOSEOUT:** Evidence was provided of the correction of the infrastructure situation, also the site is verifying this requirement in routine inspections. **COMPLETION DATE:** 12/15/2023 **CLOSEOUT DATE**: 12/21/2023

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** AMANDA ADAIR
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** AADAIR@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: JASON LOWRY: PLANT MANAGER, KELLY MALONE: QUALITY MANAGER, LACEY MESSING: FSQP, AMANDA ADAIR: FSQP, DESTINY REEVES: WAREHOUSE MANAGER.
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** THE NAMPA FACTORY WAS CONSTRUCTED IN 1942. THIS FACILITY PRODUCES GRANULATED SUGAR WHICH IS CONDITIONED AND STORED IN 12 CONCRETE SILOS. STORED SUGAR IS SCREENED AND LOADED OR PACKAGED INTO THE FOLLOWING: BULK CARS AND BULK TRUCKS, INDUSTRIAL GRANULATED - POLY BAGS AND TOTES, INDUSTRIAL POWDER - PAPER BAGS AND TOTES, RETAIL GRANULATED - PAPER BAGS, RETAIL POWDER - POLY BAGS, USED TO PRODUCE LIQUID SUCROSE, INVERT, AND COATING SYRUP. PACKAGED PRODUCTS ARE SHIPPED BY DRY VAN TRAILERS AND BOX CARS. NUMBER OF EMPLOYEES: 350 (500 CAMPAIGN). DURING THE AUDIT A TRACE EXERCISE WAS RUN WITH THE FOLLOWING INFORMATION: LOT CODE: AX23325, DATE: 11/21/23. GRANULATED SUGAR.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** JASON LOWRY: PLANT MANAGER, KELLY MALONE: QUALITY MANAGER, LACEY MESSING: FSQP, AMANDA ADAIR: FSQP, DESTINY REEVES: WAREHOUSE MANAGER.
Auditor Recommendation	Auditor Recommendation **RESPONSE:** PROCEED WITH RECERTIFICATION AFTER SOLVING NC.
2.1.1	**Management Responsibility** In regard to the food safety policy and the management committment, it is a corporate based element that is implemented in all the ASC sites, as it was confirmed by the auditor. The Practitioner commentted that in regard to food safety culture they have frequent meetings with the operators, foremen, technicians, in regard to customer information, audits, GMPs, etc. There are TV screen in lunch rooms providing information in regard to food safety, weekly news in regard to food safety culture, etc. The auditor asked to see a sample of the weekly news: December 5th, 2023. Nampa Factory Weekly Updtate. Factory Goals / WK Target / WE Actual. SQF Update: REMINDER we are still live for our unannounced SQF audit: SQF Audit dates Oct 17th - Dec 16th. Also remember to continue to be aware of GMPs and keeping areas cleaned and organized. thank you!. This is the sort of information they share every week. The auditor could interview several members of the staff during the tour and realized that they were aware of the unannounced audit and well trained in GMPs and SQF elements. There is a corporate survey in all the sites focused in food safety culture, and the results for the Nampa site were the following for year 2023: in regard to the customer complaints being communicated to the personnel, the answeres are 83 yes, and 57 no, even though they have been actually communicated in the meetings. For actually improving the communication effect the strategy is changing the locations so they can be more confortable and pay more attention.
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: Food Safety Culture Plan, WHS-PLN-003. This procedure is in place to provide a structure to the food safety culture of Amalgamated Sugar Nampa. This procedure outlines the elements that will be implemented and traciked to ensure that food safety culture is present and developing. This procedure applies to the ASC Nampa Factory, parts of the scope are covered with this plan include: employee feedback, communicating policies / responsibilities, training, performance measurement. Procedure: Employee Feedback: suggestion box, anonymous questionnair; Communicating Policies/Responsibilities: email correspondents, quality meeting; Training: Basic Safe Module Training, FSA Training, Annual Training; Performance Measurement: Food Safety Customer Complaints; Survey.

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: Both the primary and back up practitioners accredit the HACCP Training: Certificate of Participation, Developing and Implementing HACCP, May 9-10, 2018, Boise, ID, with the golden seal of the HACCP Alliance. For the backup the topics were: Introduction to GMPs, HACCP, Preventive Controls & FSMA, October 12, 2023. It is remarkable to mention that there are 3 sites in the nerby area in Idaho, and they can support to each other in all general topics in regard to Food Safety.

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:

2.1.2 **Management Review**

Evidence of the annual SQF management reveiw meeting was reviwed by the auditor, including topics such as: discussion about food defense, talk with M.S. about visitor tags; Reviewed changes in Crisis Management Plan, Reviewed Commitment to Food Safety and Quality 2023 with D.R., A.A. J.L. and F. M. Discussed running low on handsoap, Wawn Dishsopa will be used if we run out in the GMP areas; Discussed Food Defense Challenge and corrective action for the Foreman's door. Discussed PPE because of blood incident, fire incident and S.P. is working on PM Scheduled with others, Annual Training Scheduled for next month, etc. It was performen in November 2023. In regard to the monthly meetings, the auditor reviewed a sample of the minutes: October 2023 Monthly Review. Action items: Annual Module Training - A and B shift completed, still need C, D and Sanitation. Follow up meetign with sanitation on paperwork - completed. Mock recall findings. The auditor also required the evidence of the meeting for the month of April 2023: date 4/13/2023. this time the backup practitioner was covering the position. This is an exemplary situation that the company had a time without a primary practiioner so the back-up practitioner was covering all the activities.

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

Methods and responsibility for handling customer complaints are documented in Corporate based manuals and procedures. Customer Complaint Trend Analysis Summary, Total number of shipments: 7,579; Total CWT: 4,551,358; Order/Shipment Success Rate: 99.828%, Percent w/Errors: 0.172%, Total Complaints: 13, AVG Cost / Complaint: $1,904.43, Complaint Cost / CWT: 0.0054$. All of the complaints were in regard to quality issues, one of them was more related to Food Security: CONCEPT: MISSING SEALS - BULK LOADING: Seal picutres shwo that the seals weren't put in place in railcar. Problem: on 7/17/20023 customer reported receiving a rail car that was missing two seals and rail car was rejected per customer. Root cause: The dedicated employee responsible for the task forgot to do it, there was a lack of awareness of the importance of seals being placed on transportation of product. Preventive action determination: documented verbal retraining to team members and explaining the importance of seals on all outgoing and incoming product. Training was provided on 8/11/23.

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** The methods, frequency, and responsibility for verifying, maintaining, and retaining records are documented and implemented. During the audit the auditor could review a sort of different records, including CAPA requirments (Corrective Action No. C23075), Tool Box Safety Training (date: 10/19/2023), Food Safety Quality Incident Report, Date 10/09/2023.
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 not a product development area in the facility. No new products are developed. In case of new products, the FS team in in charge of validate, verify and update the HACCP Plan.
2.3.2	**Specifications (Raw Material, Packaging, Finished Product and Services)** The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications are documented. Fine Granualted sugar, bulk. Product Data Sheet. Product Description: this pure granulated sugar is a natural, ready-to-eat, food grade product produced from purified, filtered, and crystalized juice from domestically-grown sugar beets or raw cane sugar. Granulated sugar is minimally processed, kosher certified, halal suitable, vegan suitable, and screened to specification. This product can be referred to Fine Granulated Sugar depending or region. Typical uses include confectionary, beverages, jam and marmalade, baked goods, canning, canning, dairy products and fermetation.
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: Auditor took a sample for the verification of the packaging material: Material Receiving Report, Date: 11-14-23. P.O.# 311335, Vendor: Hood, Bil of lading: OIR28171, Carrier: D&B Transport, Traler seal: 29057, Description: 50# XFINE NSM, Part # 148982, Quantity Received: 252,000. Additional Space on the back: Truck Conditions: acceptable; Content Conditions: Acceptable; Disposition: Inventory/Stock. Sugar Bag Receipt Inspection Report, Record No. WHS-REC-037. Date: 11-14-23. 1. Is driver's paperwork correct? 2. Does truck meet standards for contamination and damage? if "no" write reason at bottom of page... / For the product being traced during the audit: Fawema West, Date: 11/21/23, Lot Code AX23325, Material Receiving Report, Date: 3-3-23, Vendor: Pro Ampac El Dorado, Description: 4# White Satin, Part # 075309, Quantity received: 732,500.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: National Sugar Marketing / Product Data Sheet / Baker's Special Sugar / Product Description: Our pure granulated sugar is a natural, ready-to-eat, food grade product procuded from purified, filtered, and crystalized juice from domesticaqlly-grown sugar beets. Granulated sugar is minimally processed, kosher certified, halal suitable, vegan suitable, and screened to specification. Granulated sugar reserved for retail distribution may be packaged into a variety of customer-defined bags. Typical uses include confectionary, beverages, jam and marmalade, baked goods, canning, dairy products and fermentation. Microbiological: Free of pathogenic microorganisms based on physical characteristics and empirical evidence. Microbiological values are not included on certificates of analysis. Country of origin and Manufacturing: this product is manufactured in the United States from domestically grwon crops. Screening and metal detection: Product is screened and passed through validated metal detectores before backaging. Regulatory: This is a food grade product that is generally recognized as safe by the Food and Drug Administration (FDA) 21 CFR 184.1854 and suitable for Canada FDR B.18.001. Manufacturing and hangling facilities are registered with the FDA and comply with Current Good Manufacturing Practices.

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

The site does not use any contract manufactures.

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.. Following the trace exercise, the packaging material supplier chosen was: Wedlock Paper Converters, Ltd. Third party audit report was available in the database: AIB International, GMP Inspection Results Report: TOTAL SCORE 930. For the SQF report they have a 93 points score, audit dates: 09/13/23 - 09/14/23.

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 faciliteis notify quality assurance and obtain and review current, third party audits. Additional analyses may be requested depending o the incoming product. Facilities will request all remaining documentation to add suppliers to the approved register in a timely manner.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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 stablished: Parameter: Sulfur Dioxide (SO2), Specification: <= 6, Unit of measure: ppm (mg/kg), Test methods(s): titrimetric, COA: No. Auditor review sample reports retrieved form the electronic system and they were within the parameters. Within the Food Safety manual there is a chapter 3.1. FDA Registration & Regulatory Compliance. The company ensure that all facilities utilized to process, pack, or hold our sugar products meet state and federal food regulations. As such, operating facilities will meet FDA registration requirements, which includes intial registration. This requirement extends to company-operated and contracted facilities. It is established that the SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 **Good Production Practices**

Pre-requisite programs within the Food Safety Plan are: 1. Employee Training, 2. Personnel Pratices, 3. Integrated Pest management, 4. Equipment calibration, 5. Facility & Equipment Maintenance, 6. Cleaning & Sanitation, 7. Water & Air Prorgrams, 9. Product Storage & Warehousing, 10. Sanitaty Trasnportation, 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 requiments for Current Good Manufacturing Practices (GMP) as described in the Code of Federal Regulations 21 part 117 and to support facilities Hazard Analysis and Critical Control Point (HACCP) programs. Team: Plant manager, Warehouse Manager, some senior foremen, factory lab supervisor, mechanical supervisor, Food Safety & Quality Professional. Tecnical information of the product: water activity: 0.22, moisture: 0.04% Max, sulfites: 2 to 5 ppm. Must be less than 10 ppm. Microbiological: will not support the growth of vegetative pathogens. Meets ISBT and NFP standrds for use in carbonated beverages and canned foods. Process Flowcharts: Beets fo Fillmass: the flowchart outlines the factory mill, including slicing, extraction, purification, and crystallization. The separation in diagrams is based on product risk and resulting hygienic zoning. The factory process precludes any food safety hazards in prior to crystallization. Process Preventive Control: Critical Control Point Summary: Process control step: CCP Metal Detection (Packaged & Bulk Metal Detectors), Hazards: metal, Parameters, values, or critical limits: Functioning metal detector that can detect 1.5 Fe, 1.8 NF, 2.0 SS, and 2.0 Al mm spheres. Monitoring: What: all product passes through an operating metal detector, how<. monitor according to SOP 6.3-01 CCP Monitoring: Metal Detector. Frequency: conduct the inspection at the beninning of a startup, a shutdown of two hours or longer, at the end of a prodution run (no following shift), and at least every 1.5 on the Concetti. Bulk detectors are tested after each vessel. Who: trained warehouse operator. Reccords: Monitorin Activity: 6.3.-01.0 Critical Control Point: Packaged Product Metal Detector and 6.3.-01.1 Critical Control Point - Bulk Loading Metal Detector. Records are retained according to retentional policies.

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: Nampa Facility, Food Safety Plan, Granulated sugar. Powder Sugar. Plan contents: Facility & Food Safety Information. Product Description: Granulated Sugar, Powdered Sugar. Flow Diagram: Beets fo fillmass. Flow Diagram: Granulated. Process Preventive Control: Metal Detection Summary. Magnets. Signed up by: Plant / warehouse manager, date: 11/21/2023, and also local HACCP Coodinator: 11/16/23. There is another HACCP plan for Liquid Sugar and Medium Invert Sugar, also signed by Plant / warehouse manager, date: 11/21/2023, and also local HACCP Coodinator: 11/16/23. Finally, another HACCP Plan for Crystalline and Liquid, Betaine. This last one is out of the scope of the SQF systems.

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: Team: Food Safety and Quality, Plant Manager, Maintenance Manager, Regional Lab Manager, Warehouse Maintenance Supervisor, Warehouse Supervisor, Production Manager, Engineering Manager, and Food Safety System Specialist.

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: There are 3 different HACCP plans including 3 product categories: 1) Granulated Sugar + Powdered Sugar, 2) Liquid Sugar + Medium Invert Sugar, 3) Crystalline and Liquid + Betaine. This last one is not within the scope of the SQF system, it is for feed products.

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: Granulated sugar. Technical name: sucrose.

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: Granulated sugar is sold as retail or distributed to food procesos. Liquid sugar is distributed to food processors that provide product 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: For liquid sugar, invert sugar, coating syrup, and cane molasses: All this ingredients: water, sodium hydroxide, acid hydrochloric - liquid / invert sugar mixing - CCP Liquid Filter - liquid loading - shipping.

2.4.3.7 The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.8 The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.9 The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

RESPONSE: COMPLIANT

EVIDENCE: Process Preventive Control: Critical Control Point Summary. CCP Liquid Filter. Hazards: foreign material (physical hazards).

2.4.3.10 Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.11 For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

RESPONSE: COMPLIANT

EVIDENCE: Filter, 100 microns or less, is intact and in place throughout product loading.

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: final filter with a porosity of 100 microns or less; How: monitor the final filtere according to SOP 6.3-02 ccp Monitoring: Liquid Filter, Frequency: Conduct the inspection after loading each liquid trailer or each shipment of liquid totes. 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: Operator notifies supervisory personnel. Supervisory personnel complete correcive action according to SOP 6.3.4-04 HACCP Deviation: Liquid Filter.

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: Critical Control Point: Liquid Filter. CCP No. 13 Liquid - Coating. Date: 12-4-23, Tank # 3, Order # 2198674, Trailer # 353, Loadt lot: AX23338L2. Any abnormal debris found on filters: NO, Are any filters missing? NO, Any holes in filters: NO.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

Lab location: Nampa. Date: 10/11/2023. Analyst: Nathan B., A11. Analyst Results / Proficiency Comparison: Color 27.63/28.0, Turbidity: 4.6 / 4.0, Moisture: 0.016/0.012, SO2: 3.95 / 1.3. The auditor reviewed the 18 technician's reports and all of them were PASS. For the product that was being traced: Nampa Belt/Retail: Date: 11-21-23, Gran Type: (belt): Belt Silo, Silo # 8, Lot #: AX23325. Analytical Laboratories Inc is the third party lab performing the water analysis. This laboratory is accredited: A2LA Scope of accreditation to ISO/IEC 17025:2017, Biological. Valid to: June 30, 2024. Certificate Number: 2699.01.

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**

Corporate Food Safety and Quality Record, Food Safety Quality Incident Report, Record No. 7.4-010, Rev. 2, Incident number: FM23-19, Date: 10/09/23, time: 10.30 am, Incident report: found blood on bag magazine and on the machine door. Location: East fawema, bagged: Resource No. 020004WIB, Product Lot No. AX23281 and AX23282, Pallet / Tote 1-28 and 1-5/6-11, Locations: A27C / I-11. Correction: Stopped the line put product on quality hold and sanitation crew will sanitize the line. 10.00 am: had to clean up blood that was found on the East Fawema by the bag filler. Correction: have glove on to help prevent cuts on hands. Explanation: an employee working on the Fawma Line scraped hand when loading packaging bags and did not notice hand was bleeding. Root cause: employee was not wearing proper PPE when operating bay feeder, employee scraped hand en equipement. This product was discarted, notified environmental. Mass Balance: Scale Ticket 94,060. Amal: 89,856. Total pallet weights: 2,304 lbs. There is evidence of the Municipal Solid Waste receipt, date: 11/30/23, by the Canyon County Idaho.

2.4.5.1 The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure:
i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and
ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.5.2 Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.6 Product Rework

Site's policy is that they do not rework. Company does not repack either.

2.4.7 Product Release

The responsibility and methods for releasing products are documented and implemented, For the product used for trace exercise: Certificate of Analysis, Date: 12/06/23, Customer #: 10612126, Lyons Magnus C/O Golden State Foods. Ship Warehouse: NAMPA Factory. Manufcturing date: 11/21/23. Resource Number: 020104MCW, 10/4'S WHITE SATIN, Lot Number. AX23325. Moisture: 0.014%, Cond Ash 0.013%, +100 97.0%, +040 38.0%. This product is certified to meet Amalgamated specification, guaranteed > 99.85% sucrose.

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 Exeption. Review Date: 02/24/2023. General Information: Policy: Risk Analysis. Purpose: To formarlly document and evaluate risks associated with environmental pathogens. It is concluded, through testing and peer reviewed jornals, 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 tance. Microbiological: One key factor in microbial activity and pathogen growht is water acrtivity (aw).

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes.
The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE: Risk/Vulnerability Assessment: this is a riks assessment performed by the corporate basis to formally document and evaluate risk associated with environmental pathogens. It is concluded, through testing and peer reviewed journals, that environmental pathogen testing is not required for sugar products.

2.4.8.2 An environmental sampling and testing schedule shall be prepared. It shall at a minimum:
i. Detail the applicable pathogens or indicator organisms to test for in that industry;
ii. List the number of samples to be taken and the frequency of sampling;
iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and
iv. Describe the methods to handle elevated or undesirable results.

RESPONSE: COMPLIANT

EVIDENCE: Risk/Vulnerability Assessment: this is a riks assessment performed by the corporate basis to formally document and evaluate risk associated with environmental pathogens. It is concluded, through testing and peer reviewed journals, that environmental pathogen testing is not required for sugar products.

2.4.8.3 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

RESPONSE: COMPLIANT

EVIDENCE: Risk/Vulnerability Assessment: this is a riks assessment performed by the corporate basis to formally document and evaluate risk associated with environmental pathogens. It is concluded, through testing and peer reviewed journals, that environmental pathogen testing is not required for sugar products.

2.5.1 **Validation and Effectiveness (Mandatory)**

The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program are documented and implemented. 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 that 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 control the product safety.

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)

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 are documented and implemented. Monitoring activity: Supervisory personnel verify the monitoring activity through record review within 7 days of record generation. The review is inddicated 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 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, are documented and implemented 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

The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System are documented and implemented.. Internal Audit Report Scoring 95.64%, Percentage complete: 100%, Exemplary: 1, Fully Compliant: 284, Partially compliant: 24, Area Needs Improvement: 12, Not applicable: 15, Not scored: 11, No. of Questions: 347. Documentation audit date: 08/24/2023. Inspection audit date: 09/14/2023. For the finding: "employees were observed returning from break and entering the warehouse without washing their hands. There were roughly 13 employees observed and seven didn't wash their hands". There is evidence of feedback provided to the personnel: Tool Box Safety Training, Date 10-5-23, Indstructor: Practitioner. Subject: Spague Captures in warehouse, keep doors closed entering warehouse when not in use / GMP -washing hands / Corrective action: Internal Audit findings - clutter, BMPS, Captures, packaging on floor. Customer complaints.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.6.2 **Product Trace**
4.4. Traceability. 4.4.1. Purpose: the purpose of this policy is to define the standards for facilities to maintain traceability programs and to outline traceability requirements for finished product, ingredients, and packaging materials. 4.4.2. Policy: Facilities perform trace exercises for finished products and raw materials (ingredients and packaging materials). Trace exercises evaluate a given facility's ability to identify product produced. During the audit a trace exercise was run with the following information: Lot Code: AX23325, Date: 11/21/23.

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 prompltly to protect customers and reduced the cost impacts of a recall. The plan is tested each calendar year against standards for success, and NSM or facilities implement corrective actions when testing reveals opportunities for improvement. Recall Exercise Status Report, August 22, 2023. Scope: nampa Mock Recall will include the lot identified, product loaded and customer who received the product. Summary of activities: The test was initiated through an email at 12:30 pm. A.A. (Nampa) conducted the trace, recall and submitted the documents through email. Record review on August 22 was completed by L.M (Boise). It was identified the mock recall was performed on the incorrect product but was quickly fixed when the review process began by Corporate. The product was traced and documented. Another review of the mock recall was completed on August 28, 2023 of the document review since there was an internal audit being performed fo that week. Mock Trace conducted on corn starch, lot # 1B000449767 tote # 223. Mocak Recall on powder sugar for product July 14 and 15, 2023. Scenario: supplier recalled the corn starch lot # 1B000449767, tote # 223.

2.6.3.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:
i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall;
ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information;
iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and
iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.2 The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward).
Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.3 Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.4 Crisis Management Planning

Crisis Management Plan, Document 3.8.S-001. Revision # 20. The intent of this procedure is to work in conjunction with the local Paul Facility Emergency Response & Contingency Plan, and to outline the food safety and quality measures in place to ensure that any product affected by potential crises is handled accordingly. This procedure is to only be enacted once the crisis has been addressed and the area been deemed as safe for personnel. Situtations considered: Contamination and/or recall, major equipment failure, power failure, explosing and/or fire, etc. 2023 Crisis Management Exercise completed on 9/20/23. On 9/29/2023 Crisis Management Exercise was emailed to Crisis Management Team. Crisis involved looss of all Daily CCP records on August 29, 2023. The following Key members: Plant Manager, Maintenance Manager, Corporate Safety Director, Regional Lab Manager, Factor4y Lab Supervisor, Food Safety Quality Professional, Quality Assurance Management / Corporate. On 9/29/23 Investigation email started from FSQP A.A. notifying all Crisis management Team of incident, as well as notifying the corporate crisis management team of the occurrence. The outcome of this exercise was found to be sufficient, and communication was executed appropriately. All needed personal participated in this exercise. No areas of improvement or changes are needed currently.

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. Nampa Food Defense Challenge. This is the report for the challenge performed by Mr. J. T. Warehouse Manager, Colorado Facilities: "Once I was in Nampa, Idaho I went to the local Home Depot and purchased a plain hard hat and other safety clothing. 9/6/2023 Nampa: 11.28 am. After circling the facility twice I decided the best point of entrance would be just to enter the front gate as a guest would. I pulled up to the guard shack where an elderly gentleman anded me a clif board without asking me any questions. I had nothing on my person or my vehicle that would indicate that I worked for ASC. I am also confident that I had never met this man before, so he would not have recognized me from the past. I filled out the sheet, wthring down the same thing as the person who entered before me. As I handed back the clipboard the nodded with a smile and opened the gate for me. I parked, donned my safety gear, and followed a young man carrying 4 pizzas into the employee breakroom. On the way out I was able to bypass the lock in the foreman0s office by inserting my hotel key between the door and lock and easily open it. My overall recommendations would be to push for employee interaction. I would also recommend adding a decal to hard hats to identigy employees and perhaps a badge for authorized visitors. The only mechanical failure was the door lock in the nampa foreman's office". After this exercise was performed, there is evidence of retrain of security officers by the company SECURITAS SECURITY SERVICES, dated on october 19, 20, 23 and 24. 2023.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2 Food Fraud

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1 **Allergen Management**

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: There are no allergenic materials in the site.

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

Training Attendance, Food Safety Record. Record No. WHS-REC-029. Date: 10/3/23, Time: 7:25 a. Course title: Onboarding new hire modules 1-4 New Hire. Course descirption: module 1 - SQF, Module 2 Pre-requisite programs, Module 3 HACCP Programs, Module 4 - Food Defense Training (1 hr 17 minutes). Instructor: A.A. The attendance list included Miss Petra C., who was actually interviewed by the auditor during the tour about the initial orientation. The auditor also required the evidence of the training of a old employee that was also interviewed during the tour: Gerardo H., this refresher training includes the following topics: Module 1: SQF, training history: 04/09/2021, 10/05/2022, 12/06/2023. This person was hired in the company in 12/05/1995.

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 site is located in the city of Nampa, no neighbors nearby, no source of possible contamination is considering affecting the product. The State of Idaho does not require a permit or license so the auditor required to review the FDA registration: Registration Number 105xxxx4112, Amalgamated Sugar Company Cooperative, 138 W. Karcher Rd, Napa, ID, 83687, United States.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2	**Building Materials** During the tour it was observed that the infrastructure in general is adequate to the nature of the product and process, floors, walls, celings, are in good maintenance. / NCm: in remelt room the juntions between floor and wall are not in good maintenance and are accumulating dirt.
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:** MINOR **EVIDENCE:** NCm: The SQF code requires that wall-to-wall and wall-to-floor junctions be designed to be easily cleaned and sealed. In remelt room the juntions between floor and wall are not in good maintenance and are accumulating dirt. **ROOT CAUSE:** The junction between the east wall of the remelt room and floor is believed to be due to normal wear and tear of the building structure from aging of foundation. **CORRECTIVE ACTION:** 1. Large crack in the juction was sealed to prevent dirt and sugar dust collection. 2. During internal audits the junctions will be monitored and any findings will be discussed in monthly management meeting's. **VERIFICATION OF CLOSEOUT:** Evidence was provided of the correction of the infrastructure situation, also the site is verifying this requirement in routine inspections. **COMPLETION DATE:** 12/15/2023 **CLOSEOUT DATE**: 12/21/2023
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 it was observed that the areas that are under the scope of the SQF systems are well illuminated, the light are shattered and no particular issue was observed in regard to this element.

11.1.3.1 Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3.2 Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3.3 Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.4	**Inspection/ Quality Control Area** There is an on-site labortory performing quality testing, this is well located, not posing a risk to the product safety.
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** During the tour it was observed that there are UV Lights for the control of flying insects not posing a risk to the product. All external windows, ventilation operings, doors, and other openings are effectively seal. By the way they have glass blocks instead of windows in some areas of the plant that provide good light quality and low risk to get broken, for instance by a incident with a bird or so. No particular issues in regard to this element.
11.1.5.1	All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.5.2	External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.5.3	Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.1.6	**Ventilation** The nature of the process is to make some dust created by the sugar, but during the tour it was observed that the company is very well ventilated, all the ventilation equipment is working well.
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** All equipment and utensils were observed adequate to the nature of the product and process. All the equipment are kept in clean and serviceable condition to prevent any kind of contamination.
11.1.7.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.2	Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.1.7.3	Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.4	Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.5	Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.6	Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.7	All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.8	Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.1.7.9	Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.1.8	**Grounds and Roadways** Paths and loading / unloading areas are well maintained so they do not present a hazard to the food safety operations of the premises.
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** The methods and responsibility for the maintenance and repair of plant, equipment, and buildings are documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The auditor had access to the PM program: for instance September - December 2023 activities. For November 28, West Fawema equipment was scheduled. The auditor also reviewed the Maintenance Log for Final Product Equipment records: Date 11-17-23, equipment name: Pulverizer, reason for working on equipment: chip scale, grease bearings. All the records include a part for the confirmation of parts and cleaning of equipment: 1) I have accounted for all tools, 2) I have accounted for all parts or materials, 3) warehouse foreman or end foreman has been notified that work has been completed. For the foreman / leadman: assigned personnel have been notified that equipment is ready for cleaning. Equipment has been cleaned. Equipment and any glass or brittle plastic has been inspected. Etc. This is also signed by: person who performed maintenance, foreman/leader, and the warehouse manager. This particular record was signed up on 11/21/2023. Maintenance department structure was reviewed also: Maintenance manager reports directly to Plant Manager, there are also: Mechanical supervisor, reliability engineer, planning & scheduling supervisor, Asst. Maint. Manager, and many others. The auditor also reviewed samples of the maintenance work orders. Location: sugan room, W.O. interval: monthly, December. Equipment description: Air Conditioners / Filters. Personnel required (options are: mechanics, electricians, carpenters, welders, instrument, pipe filters, yard crew, cleaning crew): miscellaneous. Safety equipment required: review all safety procedures before beginning any work. Other special safety needs: PPE as required. Work to do: clean or replace filters on sile conditioner. Clean or replace filters on packaging lines - as needed. Within the internal audit, there is an on-going open action in regard to maitenance documentation: Action: during the internal audit it was found that Preventive Maintenance Inspections were not being documented from January to October. Recommendation: PM scheduling was created , Lube inspection are being done since October 26, 2023.
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: By reviewing chemicals used in maitenance they are food grade for th products that have possible contact with food.

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 escorted by a staff member. There are 265 contractors approved in Amalgamated Sugar company, for the whole corporation

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: All maintenance and other engineering contractors are scorted at all times until their work is completed.

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

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, are documented and implemented.Within the Quality Manual, 5.5. Equipment Calibration: Food Safety. 5.5.1. Purpose: The purpose of this policy is to define the calibration program for equipment relating to food safety and Partner Facilities´s Hazard Analysis and Critical Control Point (HACCP) programs. Related items include metal detectors, magents, and temperature probles for wash bays. This policy does not apply to filters for liquid sucrose. / Certificates were reviewed: RLS Consulting, LLC. Re: Metal Detection Audit. March 17, 2023. This letter is the summary of all the calibrations for the metal detectors: "I have completed the trhid -party metal detection audits of the 14 detectors located at your facility on March 14, 2023 with S.L. This third-party audit is to validate and verigy that on that date and time your detectors were performing to the manufacturer's specifications. The detection specification set by Amalgamated Sugar Company were used for the testing. The actual audit testing incorproated the use of R.L. S. certified samples to verify the size, sample, materials, and detection signals. Each detector tested is thoroughly documented and any adjustments made bave been noted in the attached sheets." Magnet Pull Test Trending. Record period is from 2011 up-to-date. There are SE Bulk Loading # 29 Ceramic, SE Bulk Loading # 30 Ceramic, SE Bulk loading # 36: Rare Earth. Etc. The policy is to purchase every year a new pull test equipment: Magnet Pull Testing, Document Number 10.3.1-01. Purpose: The purpose of this procedure is to standardize the way that magnets are evaluated for effectiveness & replacement across the company.

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** A documented pest prevention program is effectively implemented. SPRAGUE is the contractor for pest control. The auditor reviewed all the information at the company's portal. Trend Analysis report is available issued by SPRAGUE (www.spraguepest.com), Pest Program Review: Amalgamated Sugar - Nampa Factory. Program Review Date: 05 Apr 2023. Type of Review: Quarterly - Q1. Location regulatory requirements, third party auditors and certifiers: SQF, other FAMI-QS. Pest Activity Trend analysis review: Review pest sighting log, past captures, and possible solutions to prevent pest or improve services. "I have reviewed your pest trend analysis from last year. There has been roden activity found. Most captures are found in the beet mill side of your facility. This mostly contributed to doors being found open. Going forward, I will stay on top of this. In other areas, roden activity is minimal. Your flying insect activity is consistent with this facility. Coing into srping, your flying insect activity will increase. I will set your flying insect threshold at 125 per per light. Your proactive pest management program is working as intended".
11.2.4.1	A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.4.2	Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.2.4.3	Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5 Cleaning and Sanitation

5.7. Cleaning, Sanitation, & Waste management. The company and partener facilities operate in an hygienic manner by designing, implementing, and documenting cleaning and sanitation programs. These programs are based on product risk and include documented SOPs/WIs, MSS, and verification practices. Facilities implement the following requirements when applicable: Non-GMP Area Cleaning, Dry Cleaning, etc. Records of the cleaining inspections were reviewed by the auditor, in regard to the week of manufacturing of the product was has being used in the trace exercise. Liquid Station, week of: 11-20-23/11-26-23. Comments in this report: Thermometer is in good condition. No Liquid on night shift Thruesday, Saturdady and Sunday. Sanitation Driver Record No. WHS-REC-057. This record includes: week of 11.20.23. Daily Job activities: 1. check for leaks and causes and report to Foreman. 2. Unload and put away incoming materials. 3. Rotate materials first in first out. 4. Clean north east shse of pallets and trash. Top of bulk storage sweeper, record No. WHS-REC-058. Granulated Tote Filling Room Sweeper, Record No. WHS-REC-054. The rest of the records are: Rotex Floor Sweeper, Bottom Bulk Storage Sweeper, East Warehouse Sweeper, Leadman, Powder Room Sanitation. Bulk Loading Sweeper. Warehouse Extra Station.

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:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1	**Personnel Welfare** 5.3. Personnel Practices. The Company Implements GMP practices to ensure compliance with food regulations and to protect our food products from adulteration. This policy outlines the personnel-related requirements of GMPs. Full implementation of this policy ensures that employees interfacing with product, packaging, or food contact surfaces do not become a source of contamination. 5.3.2. Policy. The Company implements GMP practices to ensure compliance with food regulations and to protect our food products from adulteration. This policy outlines the personnel-related requirements of GMPs.
11.3.1.1	Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces. **RESPONSE:** COMPLIANT **EVIDENCE:** It is explained in the NSM + QA + Manual 2022 + Website: "5.3.2.7. Employees requiring medical alert jewelry, necklace below the shifrt 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:

11.3.2.6 When gloves are used, personnel shall maintain the handwashing practices outlined above.

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. Due to this fact the risk of any pose of product contamination is controlled. Besides, just for entering the facility the GMPs are required: use of proper personal protective clothing and equipment, and sign-up of GMPs declaration.
11.3.4.2	All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.4.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5	**Staff Amenities (change rooms, toilet, break rooms)** The auditor confirmed during the tour that the staff ammenities are adequate due to the type of process, products, number of personnel working in the factory, etc.
11.3.5.1	Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.2	Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean. **RESPONSE:** COMPLIANT **EVIDENCE:**

11.3.5.4	Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.6	Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.7	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.8	Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.9	Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.3.5.10	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 Haldning and Processing Operations** The design of the site is in such a way that does not allow the cross contamination of the products, in fact they have devided the are into GMP and non GMP zones.
11.4.1.1	All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.4.1.2	Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.4.1.3	The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.5.1	**Water Supply** The water source in this site is the City of Nampa.
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: In case there is an event for water sourcing from the city, there are a couple other sites from the company that can supply Liquid Sugar to clients.

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: Annual Inspection Report, Completed on: 2023-10-03. Report of Inspection / Test Annual NFPA 25. Provided by ALL VALLEY FIRE, Inspections & Services. General questions: Valve area: are the control valves (including backglow preventer isolation valves) supervised with seals in correct (open or closed) position? YES.

11.5.1.5 The use of non-potable water shall be controlled such that:
i. There is no cross-contamination between potable and non-potable water lines;
ii. Non-potable water piping and outlets are clearly identified; and
iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1.6 Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2 Water Treatment

There is no water treatment in this facility

11.5.3 Water Quality

Analytical Laboratories Inc. Laboratory Analysis Report. Sample Location: Liquid Sugar. Date received: 03/23/2023. Disinfection Byproducts (DBP) (like Monochloroacetic acid, Haloacetic Acids): ND, Inorganics (like Cl, N, F): ND, Mercury: ND, Metals by ICP (Ba, Cu, Fe): ND, Metals by ICP-MS (As, Cd, Cr, Pb, U): ND, Microbiology (Fecal Coliforms): <1, Total Metals (Metals digestion): complete, Volatiles (like Chloroform, Bromoform, etc.): ND. All the methods used are related to EPA 524.2. This laboratory is accredited: A2LA Scope of accreditation to ISO/IEC 17025:2017, Biological. Valid to: June 30, 2024. Certificate Number: 2699.01.

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**
The site does not use Ice.

11.5.5 **Air and Other Gasses**
No air or other gasses are used in direct touch with 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, debri, excess dirt, water damage, or any other contamination.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.2 Cold Storage, Freezing and Chilling of Foods

There is no cold storage, freezing or chilling of foods in this facility.

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

The auditor confirmed that the chemical products were stored in a secured way, three cabinets containing the sanitation products were padlocked.

11.6.4.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be:
i. Clearly labeled, identifying and matching the contents of their containers;
ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and
iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.2 Storage of hazardous chemicals and toxic substances shall be:
i. Located in an area with appropriate signage indicating that the area is for hazardous storage;
ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals;
iii. Adequately ventilated;
iv. Stored where intended and not comingled (e.g., food versus non-food grade);
v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and
vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces.
Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.5 Loading, Transport, and Unloading Practices

Loading Information, Date loaded: 12-1-23, Carrier: F., Resource: 12/2WIB, Lcoation H12, Lot # AX23330, Pallet/tote: out 23, Tuck/Trailer number: W15602. Trailer Inspection: Floor, walls, ceiling in good condition: yes; any objectionable odor: no, evidence of insect or rodent infestation: no, floor dirty: no. For the liquid sugar: Liquid Trailer Cleaning Certificate, Record No. WHS-REC-078, Version 07-1.05. Date: 5-31-23, Carrier name: Handy, Order #: 2158127, Tralier # 704, Customer: 10424109. Current production loaded in trailer: liquid sugar (other options are: coating syrup, molasses). Wash procedures: Must wash with 180 degree Fahrenheit effluent water for 15 minutes. Pre wash inspection, vents & gaskets, 140o rinse temperature 5 min time elapsed 185o Def.F. was temp. 20 mins time elapsed, wash batch # 518. Cleaning sanitizing inspection: tank interior, dome lids & covers, valves & adapters, caps & gaskets, hoses & hose tubes, pump, tank exterior, hot water rinse, Seal numbers: AGM-01434154-AGM-01434161, Final inspections comments: Brix 66.6 return seals AGM-01434162-AGM-01434165, Celaned & Inspected by: S.M. Loaded by: S.M.

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

No high-risk processes in this site.

11.7.2 Thawing of Food

No thawing of food in this site.

11.7.3 Control of Foreign Matter Contamination

5.9 Physical Contaminant Control. The Company and Partner Facilities' physical contaminant control program minimizes risks of foreign matter contamination to ensure that final products are free from extraneous materials. This program contains methods for prevention, monitoring/control, and instruction for reporting potential contamination incidents. This program fuctions in conjunction with Facilities' hazard analysis and critical control point (HACCP) plans. Glass, brittle plastic, and ceramic: glass, brittle plastic, and cerammic is virtually undetectable in non-liquid products. To minigate risk of glass contamination, facilities implement exclusion, monitoring, and reaction techniques.

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: Date: 10/31/2023. Inspected by: Practitioner. Control Area: this includes: lights, window, scale, lights, buttons, gauge, buttons, light on hopper, tote machine, emergency light, braker bod: gauges. All the elements condition was good.

11.7.3.4 Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.5 In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, thoroughly inspected (including cleaning equipment and footwear), and cleared by a suitably responsible person prior to the start of operations.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.6 Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.7 Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.8 Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.9 Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4 Detection of Foreign Objects

The sensitivity of the metal detectors is verified using 1.5 mm ferrous, 1.8 mm non-ferrous, 2.0 mm stainless steel and 2.0 mm aluminum test standards. Metal detectors are equipped with automatic rejection devices. The rejected material is then examined to determine type and source of contaminant. Critical Control Point Packaged Product Metal Detector, Record No. 6.3-01.0, Facily Name: Nampa, CCP No.: 21 West Fawema, Date: 11-21-23, Lot # AX23325 (this is the product being traced during the audit for McDonald's), Test time frame: 12.54 - 23.52 with a hourly monitoring frequency.

11.7.4.1 The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.2	Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4.3	Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4.4	Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.7.4.5	In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition. **RESPONSE:** COMPLIANT **EVIDENCE:**
11.8.1	**Waste Disposal** 5.7. Cleaning, Sanitation and Waste Management. The company and partner facilities operate in an hygienic manner by designing, implementing, and documenting cleaning and sanitation programs. Waste management: facilities control and mmonitor waste to ensure waste is conveyed, stored, and sicarded in such a way to minimize the development of odor, pest attractant, hadborage, and to protect against contamination of product, product contact surfaces, water supplies, and ground surfaces. Facilities implement the following to ensure that waste does not affect product quality or sfaety: Waste receptacles: waste bins are only used for their intented purpose. Waste sugar: facilities dispose of sugar found to be unfit for reprocessing as standard waste. e.g. landfill. Waste revmoval documentation: faciliteis incorporate waste removal into local MSS. Contractors removing waste are subject to Facilities Supplier Approval program to ensure that contractosr meet local regulations for disposal. Waste monitoring: facilities include waste removal into facility inspections and/or daily hygiene inspections. Republic Services, 1 Waste Container 3 Cu Yd, 1 Lift Per Week. Container Delivery 09/06, Pickup Service 09/08-09/30, Rental 09/06-09/30.
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 has a total industrial plant for 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: