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| Audit | SQF Food Safety Audit Edition 9 |
| Company Name | Spreckels Sugar Company |
| Company Number | 9451 |
| Audit Number | 178974 |
| Company Address | 395 W Keystone Road PO Box 581<br>Brawley, CA 92227<br>United States |
| Food Sector Categories | 19. Food Ingredient Manufacturing |
| Score | #REF! |

## Module 2 Food Manufacturing - Audit Statement - Audit

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| SQF Practitioner Name | | Name the designated SQF Practitioner | | Derek Binder |
| SQF Practitioner Email | | Email of the designated SQF Practitioner | | Derek.Binder@spreckelssugar.com |
| Opening Meeting | | People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) | | Dimitri Boratynksi: Agricultural Manager, Juan Patron: Production Manager, Shelby Drye: District Manager, Steve Olson: Warehouse Manager, Derek Binder: Technical Services Manager, virtually present: Jeremy Adamson: Director of Quality Assurance, Mia Burns: Quality Assurance, Luis Palacios: SQF auditor. |
| Facility Description | | Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details | | The Brawley Facility was constructed in 1945 and extracts and refines sugar from domestically grown sugar beets. This facility produces granulated sugar, which is condicioned and stored in bulk silos. Sugar is screened and loaaded into bulk rail-cars and trailers or packaged into 50 lb. bags and 2000 lb. flexible intermediate bulk container (FIBC) supersacks (totes). Bags and totes are shipped via truck to forward warehouses or direct to customers. Intercampaing: for maintenance, and Campaign: season for production. This is important to understand for this company, April-August: Campaing. The company has 1 HACCP plan, with about 370-400. Size of the plant: 200,000 sqt -20,000 sqf warehouse-. |
| Closing Meeting | | People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) | | Dimitri Boratynksi: Agricultural Manager, Juan Patron: Production Manager, Shelby Drye: District Manager, Steve Olson: Warehouse Manager, Derek Binder: Technical Services Manager, virtually present: Jeremy Adamson: Director of Quality Assurance, Mia Burns: Quality Assurance, Luis Palacios: SQF auditor. |
| Auditor Recommendation | | Auditor Recommendation | | Proceed with the recertification after solving the minor violations found during the audit. |

## Module 2 Food Manufacturing - 2.1.1 - Management Responsibility (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.1.1.1 | M | Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to:<br>i. Supply safe food;<br>ii.Establish and maintain a food safety culture within the site;<br>iii. Establish and continually improve the site's food safety management system; and<br>iv. Comply with customer and regulatory requirements to supply safe food.<br>The policy statement shall be:<br>v. Signed by the senior site manager and displayed in prominent positions; and<br>vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel. | Compliant | |
| 2.1.1.2 | M | Senior site management shall lead and support a food safety culture within the site that ensures at a minimum:<br>i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures;<br>ii. Adequate resources are available to meet food safety objectives;<br>iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;<br>iv. Employees are informed and held accountable for their food safety and regulatory responsibilities;<br>v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and<br>vi. Employees are empowered to act to resolve food safety issues within their scope of work. | Compliant | |

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| 2.1.1.3 | M | 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.<br>Job descriptions for the key personnel shall be documented.<br>Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives. | Compliant | |
| 2.1.1.4 | M | Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to:<br>i. Oversee the development, implementation, review, and maintenance of the SQF System;<br>ii. Take appropriate action to ensure the integrity of the SQF System; and<br>iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System. | Compliant | |
| 2.1.1.5 | M | The primary and substitute SQF practitioner shall:<br>i. Be employed by the site;<br>ii. Hold a position of responsibility related to the management of the site's SQF System;<br>iii. Have completed a HACCP training course;<br>iv. Be competent to implement and maintain HACCP based food safety plans; and<br>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 | Compliant | |
| 2.1.1.6 | M | 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. | Compliant | |
| 2.1.1.7 | M | 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. | Compliant | |
| 2.1.1.8 | M | 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. | Compliant | |
| | | | **Summary** | Commitment to Food Safety and Quality: this is a corporate document, but signed locally by the upper managers: President & CEO (National Sugar Marketing, Amalgamated Sugar, Southern Minnesota Beet Sugar Cooperative), Technical Services Director, Director of Quality Assurance, Warehouse Manager, District Manager, Technical Services Manager. Food Safety Culture, procedure 02-BQAA-08 Food Safety Culture. Issue date: 4/29/2023. This policy defines how Spreckels Sugar Company Inc. (SSCI) food safety culture, how food safety metrics are tracked, reported, and communicated throughout the SSCI organization. Food Safety Culture Goals and Metrics: 1) increase employee overall basic food safety knowledge by 15%, 2) internal food safety incident rate under or at 0.08%, 3) continuously working toward 0 substantiated foreign material customer complaints. The results are according a quarterly survey, the tracking of the incidents, foreign material receive from customer complaints. Organizational Chart for this facility was reviewed: updated in 4/29/2023. There is an SQF Practitioner (Technical Services Manager), and there is an alternate the Warehouse Manager. HACCP training certificates are available for both practitioners. NC State University, Introductory Course for Development of HACCP Spring 2016, and also for the backup: International Food Safety & Quality Network, 31 st May 2022. |

## Module 2 Food Manufacturing - 2.1.2 - Management Review (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.1.2.1 | M | The SQF System shall be reviewed by senior site management at least annually and include:<br>i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan);<br>ii. Food safety culture performance;<br>iii. Food safety objectives and performance measures;<br>iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities;<br>v. Hazard and risk management system; and<br>vi. Follow-up action items from previous management reviews.<br>Records of all management reviews and updates shall be maintained. | Compliant | |
| 2.1.2.2 | M | 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.<br>The updates and management responses shall be documented. | Compliant | |

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| | **Summary** | The strategy of the management reviewing's is by monthly meetings, they cover the whole SQF system. So the auditor proceed to review samples of the meetings minutes to confirm this situation: Date: 02/16/2023, Start time: 09:05 am, Finish Time: 09:53, Food Safety topic Presentation: Product Recall video; Key take aways: product recalls are very costly and can put businesses out of business; In almost every circumstance of a product recall most companies were warned in advance and did not heed the warnings. Changes to Food Safety Managements System Documentation (Policies, Procedures, specifications, Food Safety Plan). Other minutes were reviewed by the auditor: January, March, April 2023 and it was seen that the whole SQF system was covered. |

## Module 2 Food Manufacturing - 2.1.3 - Complaint Management (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.1.3.1 | M | 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. | Compliant | |
| 2.1.3.2 | M | Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents. | Compliant | |
| 2.1.3.3 | M | 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. | Compliant | |
| | | | **Summary** | Customer Complaint Management procedure is available, within the Quality Assurance Manual. The purpose of this policy is to outline the company's program for handling customer complaints. Effective complaint handling drives root cause analysis and continuous improvement. Policy: The company addresses all customer complaints and the NSM Quality Assurance Team is responsible for general oversight of the complaint program, including overseeing root cause investigation and closure and customer correspondence. The site has a pareto analysis, they can access all the sites performance, and the auditor asked to filter to this site's performance during year 2023. During 2022: 1, 2021: 3, 2023: 1. None of them against food safety. |

## Module 2 Food Manufacturing - 2.2.1 - Food Safety Management System (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.2.1.1 | M | 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:<br>i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;<br>ii. The food safety policy statement and organization chart;<br>iii. The processes and products included in the scope of certification;<br>iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known);<br>v. Raw material, ingredient, packaging, and finished product specifications;<br>vi. Food safety procedures, prerequisite programs, food safety plans;<br>vii. Process controls that impact product safety; and<br>viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System. | Compliant | |
| 2.2.1.2 | M | 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.<br>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. | Compliant | |
| | | | **Summary** | 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. |

## Module 2 Food Manufacturing - 2.2.2 - Document Control (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.2.2.1 | M | The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented.<br>Current SQF System documents and amendments to documents shall be maintained. | Compliant | |
| | | | **Summary** | The document owner drafts the document.<br>The quality assurance manager reviews the document for accuracy and compliance with food safety and quality assurance requirements.<br>The plant manager reviews the document for feasibility of implementation.<br>The document owner, the quality assurance manager, and the plant manager approve the document.<br>The document is communicated to all employees who need to know about it.<br>The document is made available to all employees who need to access it.<br>The document is used in accordance with its procedures.<br>The document is reviewed on a regular basis.<br>The document is updated as needed to reflect changes in food safety and quality assurance requirements.<br>Documents are retained for a period of five years.<br>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.<br>Documents that are no longer required are destroyed in a secure manner. |

## Module 2 Food Manufacturing - 2.2.3 - Records (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.2.3.1 | M | The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented. | Compliant | |
| 2.2.3.2 | M | All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed. | Compliant | |
| 2.2.3.3 | M | 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. | Compliant | |
| | | | **Summary** | NSM is storing its food safety and quality assurance documents in Microsoft OneDrive, a secure cloud storage solution. This makes it easy to share and access documents from anywhere.<br>NSM is also scanning and saving all paper documents related to food safety and quality assurance. This will help to ensure that all documents are accessible and can be easily retrieved in the event of an audit or investigation.<br>NSM has a process in place for destroying old or obsolete documents. This will help to protect the company's confidentiality and security |

## Module 2 Food Manufacturing - 2.3.1 - Specification, Formulation and Realization

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.3.1.1 | | The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.<br>New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. | Not Applicable | There is no product design in this plant. |
| 2.3.1.2 | | Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's:<br>i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology;<br>ii. Microbiological criteria, where applicable; and<br>iii. Consumer preparation, where applicable, and storage and handling requirements. | Not Applicable | There is no product design in this plant. |
| 2.3.1.3 | | A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety. | Not Applicable | There is no product design in this plant. |
| 2.3.1.4 | | Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment. | Not Applicable | There is no product design in this plant. |
| 2.3.1.5 | | The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination. | Not Applicable | There is no product design in this plant. |

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| 2.3.1.6 | | Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained. | Not Applicable | There is no product design in this plant. |
| | | | **Summary** | There is no product design in this plant. |

## Module 2 Food Manufacturing - 2.3.2 - Specifications (Raw Material, Packaging, Finished Product and Services)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.3.2.1 | | The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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). | Compliant | |
| 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.<br>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. | Compliant | |
| 2.3.2.7 | | Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel. | Compliant | |
| 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. | Compliant | |
| 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:<br>i. Microbiological, chemical, and physical limits;<br>ii. Composition to meet label claims;<br>iii. Labeling and packaging requirements; and<br>iv. Storage conditions. | Compliant | |
| 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.<br>A list of all the above specifications shall be maintained and kept current. | Compliant | |
| | | | **Summary** | Within the Food Safety and Quality Assurance Manual, 6.0 Food Quality: The purpose of this policy is to define and communicate the responsibilities and methods for specification management. Specifications include final product specifications, customer - specific specifications, ingredient / process aid specifications, packaging specifications, contract manufacturer's specifications, etc. Best seller product in this site is the 50 pounds product, so auditor asked to review the specs for this one: Product Data Sheet: EXTRA FINE GRANULATED SUGAR 50 lb. BAG, Product description: our pure granulated sugar is a natural, ready-to-eat, food grade product produced from purified, filtered, and crystallized juice from domestically-grown sugar beets or raw cane sugar. Granulated sugar is minimally processed kosher certified, halal suitable, vegan suitable and screened to specifications. Auditor also asked for the specs of the 50 lbs. bag: Hood Packaging Corporation, Food Contact Declaration: We confirm that this packaging meets the following regulatory requirements for food contact materials: US FDA 21 CRF 177 indirect Food Additives: Polymers. US FDA 21 CRF 175 105 Adhesives. Service providers are in a list, like: Terminix, pest control services, area used: entire facility, risk level: medium, GMP Training: see pest binder. |

## Module 2 Food Manufacturing - 2.3.3 - Contract Manufacturers

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.3.3.1 | | The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented. | Not Applicable | The plant does not use contract manufacturers. |

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| 2.3.3.2 | The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that:<br>i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements;<br>ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and<br>iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel. | Not Applicable | The plant does not use contract manufacturers. |
| 2.3.3.3 | Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant<br>personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times. | Not Applicable | The plant does not use contract manufacturers. |
| 2.3.3.4 | Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained. | Not Applicable | The plant does not use contract manufacturers. |
| | | **Summary** | The plant does not use contract manufacturers. |

## Module 2 Food Manufacturing - 2.3.4 - Approved Supplier Program (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.3.4.1 | M | The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.<br>A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained.<br><br>Code Amendment #2<br>Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered. | Compliant | |
| 2.3.4.2 | M | 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:<br>i. Agreed specifications (refer to 2.3.2);<br>ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier;<br>iii. A summary of the food safety controls implemented by the approved supplier;<br>iv. Methods for granting approved supplier status;<br>v. Methods and frequency of monitoring approved suppliers;<br>vi. Details of the certificates of conformance, if required; and<br>vii. Methods and frequency of reviewing approved supplier performance and status. | Compliant | |
| 2.3.4.3 | M | 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. | Compliant | |
| 2.3.4.4 | M | 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. | Compliant | |
| 2.3.4.5 | M | 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. | Compliant | |
| 2.3.4.6 | M | 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. | Compliant | |
| | | | **Summary** | Supplier Approval: The purpose of this policy is to define the requirements for supplier approval programs relating to sugar products, ingredients, processing aids (final product), packaging, equipment, and contract services. These requirements ensure that incoming materials and contracted services are of appropriate quality and conform to agreed specifications. the company ensures facilities maintain supplier approval programs for sugar, sugar products, ingredients, processing aids, packaging materials, equipment, contract manufacturers, and contract service providers. These programs mitigate food safety and quality risks that might be carried from suppliers or, in some cases, sister facilities. The company controls and verifies all the incoming materials, such as the process aids, packaging materials, etc. Documents were reviewed by the auditor, 50 Lb. poly bag roll stock. Date: 2023/04/17. Site does not perform supplier audit, they accept GFSI certified audit. The site has access to the actual report of the suppliers, for instance for Hood Packaging Corporation - Calgary Plastics, flexible plastic packaging, 05/Dec/2022. Audit score: 96. |

## Module 2 Food Manufacturing - 2.4.1 - Food Legislation (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.4.1.1 | M | 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. | Compliant | |
| 2.4.1.2 | M | 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. | Compliant | |
| 2.4.1.3 | M | 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. | Compliant | |
| | | | **Summary** | 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. |

## Module 2 Food Manufacturing - 2.4.2 - Good Manufacturing Practices (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.4.2.1 | M | 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. | Compliant | |
| 2.4.2.2 | M | The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented. | Compliant | |
| | | | **Summary** | There is a Quality and Food Safety Manual, that outlines all the GMP requirements, aligned to the SQF Code of Manufacturing, applicable module 11. |

## Module 2 Food Manufacturing - 2.4.3 - Food Safety Plan (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.4.3.1 | M | 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. | Compliant | |
| 2.4.3.2 | M | 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. | Compliant | |
| 2.4.3.3 | M | 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. | Compliant | |
| 2.4.3.4 | M | 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. | Compliant | |
| 2.4.3.5 | M | 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. | Compliant | |

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| 2.4.3.6 | M | 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. | Compliant | |
| 2.4.3.7 | M | 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. | Compliant | |
| 2.4.3.8 | M | 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. | Compliant | |
| 2.4.3.9 | M | 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. | Compliant | |
| 2.4.3.10 | M | 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. | Compliant | |
| 2.4.3.11 | M | 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). | Compliant | |
| 2.4.3.12 | M | 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. | Compliant | |
| 2.4.3.13 | M | 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. | Compliant | |
| 2.4.3.14 | M | 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. | Compliant | |
| 2.4.3.15 | M | 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). | Compliant | |
| 2.4.3.16 | M | Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used. | Compliant | |
| 2.4.3.17 | M | 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. | Compliant | |
| | | | **Summary** | There is a food safety plan that follows the HACCP Codex 7 principles and 5 previous steps, and also the Preventive Controls by FSMA. Process Preventive Control: Critical Control Point Summary. Process control step: CCP Metal Detection. Hazards: metal. Critical Limits: Functioning metal detector that can detect and reject 1.5 Fe, 1.8 NF, 2.0 SS, and 2.0 Al mm test pieces. Monitoring: What: All product passes through an operating metal detector, How: Monitor according to Metal Detector Monitoring Procedure, Frequency: Conduct the inspection at the beginning of a startup, a shutdown of two hour or longer, at the end of a production run (no following shift), and at least every 4 hours of operation. Bulk detectors are tested prior to startup and after each vessel. Trained warehouse operator (qualified individual). Corrective Action: Operator notifies supervisory personnel. Supervisory personnel place affected product on hold, complete corrective action and determine final disposition. Verification: monitoring activity: supervisory staff verify the monitoring activity through record review within 7 days of record generation indicated by a signature and date. Food Safety Plan: The food Safety Plan is incorporated into annual internal audits. The plan, CCP selection, and CL determination are reviewed/ assessed annually. Validation: Critical Control Point: CCP selection is reevaluated annually in light of emerging technological and regulatory information; documented on record 7.1 - 0.3 Validation. Critical Limits: CL or parameter selection is reevaluated annually in light of emerging technological and regulatory information, documented on record 7.1 03 validation. Samples of records of the monitoring of the CCP's were reviewed by auditor: METAL DETECTOR RECORD SHEET, 50 lb. Fine Gran Packaging Line Metal Detector Log, Shift: D, Date: 7-27-2022, Lot Code: 5B2220800:01, time: 8, 10, 12, 2 pm. Verified by:, Reviewed by: PCQI. |

## Module 2 Food Manufacturing - 2.4.4 - Product Sampling, Inspection and Analysis

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|

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|---|---|---|---|---|
| | | The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. | | |
| 2.4.4.1 | | The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements.<br><br>Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.<br><br>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. | Compliant | |
| 2.4.4.2 | | 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.<br><br>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). | Compliant | The only testing that might be considered related to food safety is the one for SO2, and there are results of the proficiency testing. The test includes the following parameters: SO2, color, turbidity, moisture, granulation. This was done over 2023-April-24th-28th. |
| 2.4.4.3 | | On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.<br>Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel. | Compliant | |
| 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. | Compliant | |
| 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 shelf life of the product. | Compliant | |
| 2.4.4.6 | | Records of all inspections and analyses shall be maintained. | Compliant | |
| | | | **Summary** | Product Sampling, Inspection & Analysis Policy, 09-Bqa-07, Issue date: 4/28/2023. Outside Testing: Periodically, the product is tested for heavy metals, pesticide residue and spoilage indicating bacteria. In house testing: in house testing of bulk trailer final product (Campaign) include: granulation, moisture, ash. Eurofins, Certificate of Analysis, Report date: 03-Feb-2023. Analysis: Arsenic, Lead, Cadmium, Mercury, under the limits, like < 5.00 ppb. This laboratory is accredited by the A2L2, certificate number 1940.01, Valid to August 31, 2024. For the pentices analysis: Eurofins analytical report, Reported on: 16/Feb/2023. Screened pesticides: Not detected at LOQ, Glyphosate < 0.01 mg/kg. There is an on-site but that only runs physical testing for the assurance of productivity, not related to Food Safety matters. |

## Module 2 Food Manufacturing - 2.4.5 - Non-conforming Materials and Product

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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:<br>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<br>ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status. | Compliant | |
| 2.4.5.2 | | Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained. | Compliant | |
| | | | **Summary** | Food Safety & Quality Assurance Manual, Nonconforming Product & Materials. The Company has established methods for identifying and handling nonconforming products or materials. Nonconforming products: Include products that are not suitable for direct sale without further processing or reclassification. These products are considered downgraded products but should not be allowed to be further contaminated with the intent of removal. Remelt Sugar (Resource 800,000): this product consists of sugar that does not meet quality specifications or contains contamination that factories remove by dissolving thermal processing, filtering, and recrystallizing. Factories are the only facilities that can process remelt sugar. Return Authorization Form, Order No. 2134263, Order Date: 02/21/23, Control No.: 3885. Customer: Batory Foods. Description: Customer rejected order due to Pest found between the plastic and the bags. Product information: resource: 100050BRW, Lot No. B159B-17, Amt: 850 bags, Qty / type: each, Disposition: designated for remelt. |

## Module 2 Food Manufacturing - 2.4.6 - Product Rework

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.4.6.1 | | The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure:<br>i. Reworking operations are overseen by qualified personnel;<br>ii. Reworked product is clearly identified and traceable;<br>iii. Reworked product is processed in accordance with the site's food safety plan;<br>iv. Each batch of reworked product is inspected or analyzed as required before release;<br>v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1;<br>vi. Release of reworked product conforms to element 2.4.7; and<br>vii. Reworked product does not affect the safety or integrity of the finished product.<br>Records of all reworking operations shall be maintained. | Not Applicable | Site's policy is that they do not rework. Company does not repack either. |
| | | | **Summary** | Site's policy is that they do not rework. Company does not repack either. |

## Module 2 Food Manufacturing - 2.4.7 - Product Release (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.4.7.1 | M | 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.<br>Records of all product releases shall be maintained. | Compliant | |
| 2.4.7.2 | M | 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).<br>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. | Compliant | |
| 2.4.7.3 | M | 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.<br>In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed. | Compliant | |
| | | | **Summary** | 7.3. Product Hold & Release. Positive Release: facilities consider all packaged or loaded production to be on quality hold until appropriate monitoring and analyses occur. Appropriate monitoring includes commencement and documentation of quality testing per Policy 6.2 Product Sampling and Retain Requirements and HACCP monitoring per Policy 5.21 Food Safety Plan. Most important factors used for the positive release are: granulation, ash, color, moisture, SO2. Releasing process is managed throughout the electronic system. If there is a problem in quality, the process is to re-test. Normally they cannot meet color, they can consider to send the product to another customer which is within this particular spec. |

## Module 2 Food Manufacturing - 2.4.8 - Environmental Monitoring

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br>The responsibility and methods for the environmental monitoring program shall be documented and implemented. | Not Applicable | This site does not have environmental testing due to the low risk of the process and product. |
| 2.4.8.2 | | An environmental sampling and testing schedule shall be prepared. It shall at a minimum:<br>i. Detail the applicable pathogens or indicator organisms to test for in that industry;<br>ii. List the number of samples to be taken and the frequency of sampling;<br>iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and<br>iv. Describe the methods to handle elevated or undesirable results. | Not Applicable | This site does not have environmental testing due to the low risk of the process and product. |
| 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. | Not Applicable | This site does not have environmental testing due to the low risk of the process and product. |

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|---|---|---|---|---|
| | | | **Summary** | This site does not have environmental testing due to the low risk of the process and product. |

## Module 2 Food Manufacturing - 2.5.1 - Validation and Effectiveness (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.5.1.1 | M | 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:<br>i. Good Manufacturing Practices are confirmed to ensure they achieve the required results;<br>ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and<br>iii. Changes to the processes or procedures are assessed to ensure the controls are still effective.<br>Records of all validation activities shall be maintained. | Compliant | |
| | | | **Summary** | There are 7 metal detectors in this facility, 1 of them is a spare. During the audit tour the auditor verified one of these detectors, and the calibration certificate was also verified: Mettler Toledo, Metal Detection PV Certificate: Location: 50 lb. bag line, Certificate date: 23-Feb-2023, Next Certificate Due: 23-Feb-2024. Another sample taken in regard to scales: LEFT COAST -scale services-, Smarter Cert Data Page Device Setup Initial Calibration Certificate. Date: 3/1/23. |

## Module 2 Food Manufacturing - 2.5.2 - Verification Activities (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.5.2.1 | M | 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<br>activities authorize each verified record. | Compliant | |
| 2.5.2.2 | M | A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented.<br>Records of verification of activities shall be maintained. | Compliant | |
| | | | **Summary** | For validation and verification of the magnets they have a pull test, 2023 Top Racks and Bottom Racks, limit is no less than 5 pounds. The result is everything passed. |

## Module 2 Food Manufacturing - 2.5.3 - Corrective and Preventative Action (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.5.3.1 | M | 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.<br>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. | Compliant | |
| 2.5.3.2 | M | Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained. | Compliant | |
| | | | **Summary** | 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. |

## Module 2 Food Manufacturing - 2.5.4 - Internal Audits and Inspections (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.5.4.1 | M | 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:<br>i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool;<br>ii. Objective evidence is recorded to verify compliance and/or non-compliance;<br>iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and<br>iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions. | Compliant | |
| 2.5.4.2 | M | 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. | Compliant | |
| 2.5.4.3 | M | 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:<br>i. Take corrections or corrective and preventative action; and<br>ii. Maintain records of inspections and any corrective actions taken. | Compliant | |
| 2.5.4.4 | M | 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.<br>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). | Compliant | |
| | | | **Summary** | Internal Audit Report, Facility Information: Brawley Factory. Audit Performance Metrics: Scoring 95.38%, Percentage Complete: 100.00%, Exemplary: 3, Fully Compliant: 256, Partially Compliant: 17, Area Needs Improvement: 14, Not Applicable: 46, Not Scored: 9, No. of Questions: 345. Audit dates: 03/22/23, Inspection audit date: 03/29/23. Auditor review the highlighted in yellow: these are the opportunities of improvement, both in module 11 and module 2. All of them have already been addressed by the auditee. |

## Module 2 Food Manufacturing - 2.6.1 - Product Identification (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.6.1.1 | M | 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:<br>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<br>ii. Finished product is labeled to the customer specification and/or regulatory requirements. | Compliant | |
| 2.6.1.2 | M | 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.<br>Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved.<br>Product changeover and label reconciliation records shall be maintained. | Compliant | |
| | | | **Summary** | 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. This procedure is corporate thus some of the concepts are not applicable to Brawley's site. Packaged product lot numbers: Facilities label packaged product with lot numbers by printing lot numbers on bags or by affixing tote products with a tag of placard. Packaged Lot Format: PFYYJJJ, Explanation: P=Partner Letter Designator (see table below), F=Facility Location Code (see table below), YY=Last two digits of the year, JJJ=Julian Date. |

## Module 2 Food Manufacturing - 2.6.2 - Product Trace (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
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|---|---|---|---|---|
| 2.6.2.1 | M | The responsibility and methods used to trace product shall be documented and implemented to ensure:<br>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;<br>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.);<br>iii. Traceability is maintained where product is reworked (refer to 2.4.6); and<br>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).<br>Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained. | Compliant | |
| | | | **Summary** | 4.4. Traceability. 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, raw materials utilized, and finished product shipping destinations during a timed event. Facilities that identify improvement opportunities implement corrective actions per Policy 1.4. Corrective Actions and Root Cause Analysis. Details of the mock recall are in the next section. |

## Module 2 Food Manufacturing - 2.6.3 - Product Withdrawal and Recall (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.6.3.1 | M | The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:<br>i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall;<br>ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information;<br>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<br>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. | Compliant | 3.2. Recall program and testing. The company has developed and implemented a procedure for handling market withdrawals, and product recalls. Recalls are only initiated with approval of the NSM Board. If initiated, the NSM Director of Quality Assurance has oversight for the procedure. SOP 3.2.-01 Recall Plan. |
| 2.6.3.2 | M | 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).<br>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. | Compliant | |
| 2.6.3.3 | M | Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied. | Compliant | |
| 2.6.3.4 | M | 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. | Compliant | NSM Quality / Recall team generates and submits a documented recall notification to the FDA, all consignees, and applicable certification bodies within 24 hours of a recall / withdrawal determination. |
| | | | **Summary** | Mock recall report is available: Annual Mock Recall Exercise, Facility Name: Spreckels Sugar Company Inc., Annual recall test. Documents requested include CCP, CoAs, BoLs, and Trace Cover Page. In addition, a recall plan, consignee list, health hazard assessment, recall strategy template, and customer notification letter will be generated. Trace date: 03/08/2023, Root Lot Number: SB22228, Manufacturing Date: August 16, 2022. Summary: Outlined below is a summary of the products produced, locations shipped, and on hand inventory. Timeline and customer distribution is available on alternate tabs. Product received: 9.344.27 CWT, Returned product: 0 CWT, On Hand Inventory: 0 CWT, Customer Shipments: Packaged: 680 CWT, Bulk Truck: 3,851.6 CWT, Bulk Rail: 4.311 CWT, Liquid Sucrose: 501.7 CWT. Total 9344.3 CWT. |

## Module 2 Food Manufacturing - 2.6.4 - Crisis Management Planning

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|

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|---|---|---|---|
| 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:<br>i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident;<br>ii. The nomination and training of a crisis management team;<br>iii. The controls implemented to ensure any responses do not compromise product safety;<br>iv. The measures to isolate and identify product affected by a response to a crisis;<br>v. The measures taken to verify the acceptability of food prior to release;<br>vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;<br>vii. Sources of legal and expert advice; and<br>viii. The responsibility for internal communications and communicating with authorities, external organizations, and media. | Compliant | March Monthly SQF System's Update, Date 04/25/2023. Reviewed crises management plan and roles and responsibilities with team members on March 10th, 2023. |
| 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. | Compliant | |
| | **Summary** | | 1.7 Crisis Management & Contingency Planning. The company implements crisis management teams and plans to ensure that crises are handled promptly and that affected product is not inadvertently release into commerce. Crisis management plans also attempt to ensure that shipments to customers are not disrupted and that any affected product is held and verified prior to release. Business continuity exercise, 03/22/2023. Purpose: to test the business continuity at Spreckels Sugar (SSCI) by creating or documenting an existing business crises of actions taken to maintain food safety standards, food defense standards, product shipment, and the business in general to limit the impact on customers. Method: Document an existing crisis. Scenario: SSCI experienced a union strike on 3/9/2023, lasting 14 days. Union employees with various skills sets impacting the following departments: Technical Services, Warehouse, Factory, Storeroom, Maintenance, and Safety. Results: District manager: During and before the strike the district manager included need-to-know non-union employees to make them aware of strike potential by the union employees. Conclusion: The crisis management plan was followed. Order fulfillment and product testing continued as planned and bulk loads were diverted to partner facilities, while maintaining the status quo of reduced loads being shipped from the Imperial warehouse experienced during inter-campaign. The Maintenance, Factory, Storeroom, and Safety were minimally impacted with the factory being ready as scheduled. |

## Module 2 Food Manufacturing - 2.7.1 - Food Defense Plan (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.7.1.1 | M | 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. | Compliant | |
| 2.7.1.2 | M | 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:<br>i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;<br>ii. The name of the senior site management person responsible for food defense;<br>iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points;<br>iv. The methods implemented to protect sensitive processing points from intentional adulteration;<br>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;<br>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<br>vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors. | Compliant | |
| 2.7.1.3 | M | Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1). | Compliant | |
| 2.7.1.4 | M | 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. | Compliant | |

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| **Summary** | Food Defense Plan, signed by Plant District Manager and Food Defense Coordinator, Date: 3/20/23. Plan contents: Facility Description, Food Defense Team & Training, Product / Process Description, Process Flowchart, Vulnerability Assessment, Mitigation Strategies, Change Log. Vulnerability Assessment Summary. Per the IA rule (21 CRF 121.130(a)), the site's vulnerability assessment considered the three fundamental elements: 1) Potential public health impact (e.g. severity and scale) if a contaminant is added, 2) Degree of physical access to the product, and 3) the ability of an attacker to successfully contaminate the product. First, the granulation process consists of a totally enclosed system with personnel monitoring their areas. The process involves extreme environments (e.g. very high temperatures and elevated pH levels) and a contaminant would be incapable of with-standing the food production process. Therefore, an intentional adulteration (including the possibility of an inside attack). Food Defense Challenge 2023: Purpose: To test the Food Defense Program aat Spreckels sugar (SSCI) by placing an anonymous phone to the main lab attempt to sus out sensitive information in a mock attempt for an intruder to gather information that could be used to access the facility and sensitive areas. The caller will pose as a random individual and ask suspicious questions. The test meets the excellent criteria as no critical information was given and management at one level of authority was notified. |

## Module 2 Food Manufacturing - 2.7.2 - Food Fraud (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.7.2.1 | M | 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. | Compliant | |
| 2.7.2.2 | M | 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. | Compliant | |
| 2.7.2.3 | M | Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1). | Compliant | |
| 2.7.2.4 | M | 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. | Compliant | |
| **Summary** | | | | Risk / Vulnerability Assessment: Product: Granulated sugar, conducted by: Jeremy Adamson, Rev: 4, Revised / Review date: 02/22/2023. Purpose: This vulnerability assessment is documented in association with the hazards analysis conducted for food safety plans and includes additional information as required by the BRCGS 3.5.1.1. and SQF 2.7.2.1. as well as economic adulteration requirements per 21 CFR 117.130 (B)(2)(iii). Sum of risk: Granulated sugar has been a very low-risk product and is used as a preservative (aw reducer) for many food applications. Provided that granulated sugar is sourced from approved suppliers and handled in accordance with current Good Manufacturing Practices, there are no additional handling requirements to ensure foo safety. There is a risk of inadvertent co-mingling of cane and beet products for facilities with bulk handling capabilities. Equipment is typically shared with designated storage areas. Facilities are responsible for ensuring product changeover for dry bulk handling. |

## Module 2 Food Manufacturing - 2.8.1 - Allergen Management (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 2.8.1.1 | M | 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:<br>i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens;<br>ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors;<br>iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known;<br>iv. A list of allergens that is accessible to relevant staff;<br>v. The control of hazards associated with allergens and incorporated into the food safety plan, and<br>vi. Management plans for control of the identified allergens. | Compliant | |
| 2.8.1.2 | M | 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. | Compliant | |
| 2.8.1.3 | M | Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored. | Compliant | |

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| 2.8.1.4 | M | 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.<br>Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible. | Compliant | |
| 2.8.1.5 | M | 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. | Compliant | |
| 2.8.1.6 | M | Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact. | Compliant | |
| 2.8.1.7 | M | 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. | Compliant | |
| 2.8.1.8 | M | 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. | Compliant | |
| 2.8.1.9 | M | 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. | Compliant | |
| 2.8.1.10 | M | 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. | Compliant | |
| 2.8.1.11 | M | 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. | Compliant | The site does not handle allergens but has a basic allergen management program. |
| | | | **Summary** | 5.16. Allergens & Sensitizing Agents. 5.16.1. Purpose: The purpose of this policy is to define the Company's allergen exclusion and awareness program. This program also includes sensitizing agent monitoring and control. 5.16.2 Policy: The company ensures that all sugar products distributed to customers are compliant with the Food Allergen Labeling and Consumer Protection Act. Products are free of known allergens and contain sulfur dioxide levels less than labeling requirements. Partner facilities employ the following methods for allergen and sensitizing agent control. 5.16.2.2. Allergen Exclusion: Partner facilities do not process or handle known allergens. Partner facilities implement the following requirements to ensure that allergen cross contact does not occur. Designated Eating & Drinking Areas: Eating and drinking substances other than water or electrolyte replacement is prohibited in GMP areas per Policy 5.3. Personnel Practices. Employees are provided with amenities separate from GMP areas that are designated for these purposes. This practice safeguards product from allergen cross contact from employee lunches. |

## Module 2 Food Manufacturing - 2.9.1 - Training Requirements

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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). | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | Employee Food Safety & Qyakutt Training. The purpose of this policy is to communicate the requirements for assessing and implementing a training program with an emphasis of food safety and quality assurance. Training is required by food regulation and critical to all food safety and quality programs. Partner facilities ensure that Partner Quality Management personnel receive and maintain. |

## Module 2 Food Manufacturing - 2.9.2 - Training Program (Mandatory)

| Name | Mandatory | Description | Primary Response | Evidence |
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|---|---|---|---|---|
| 2.9.2.1 | M | 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:<br>i. Implementing HACCP for staff involved in developing and maintaining food safety plans;<br>ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);<br>iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces;<br>iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment;<br>v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products;<br>vi. Environmental monitoring for relevant staff;<br>vii. Allergen management, food defense, and food fraud for all relevant staff; and<br>viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code.<br>The training program shall include provisions for identifying and implementing the refresher training needs of the organization. | Compliant | |
| 2.9.2.2 | M | 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. | Compliant | |
| 2.9.2.3 | M | Training records shall be maintained and include:<br>i. Participant name;<br>ii. Skills description;<br>iii. Description of the training provided;<br>iv. Date training completed;<br>v. Trainer or training provider; and<br>vi. Verification that the trainee is competent to complete the required tasks. | Compliant | |
| | | | **Summary** | Facilities within the corporation employ general classroom settings, which may include the following methods for employee training: Presentation / video, retention testing with passing scores of 70%, signed or electronic attendance acknowledgement, further supervisor / manager observations of trading effectiveness. This is an annual scheduled for everyone, sample of the trainings attendee by the personnel at the lab were reviewed by the auditor: Rodolfo, laboratory technician, evidence in the system that he has attended: Food Defense, Food Safety, GMP, Allergen, Food Safety and Quality Commitment. Carol Rosales, another technician, same topics and same performance including tests. |

## Module 11 - 11.1.1 - Premises Location and Approval

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br>The construction and ongoing operation of the premises on the site shall be approved by the relevant authority. | Compliant | |
| | | | **Summary** | State of California, Department of Public Health Food and Drug Branch, Processed Food Registration, Registration Number. 45924, Expiration date: 6/7/2023. There is no neighbors around, all the land nearby the company belongs to the company. |

## Module 11 - 11.1.2 - Building Materials

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br>Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place. | Compliant | |
| 11.1.2.2 | | Drains shall be constructed and located so they can be easily cleaned and not present a hazard. | Compliant | |
| 11.1.2.3 | | Waste trap system shall be located away from any food handling areas or entrances to the premises. | Compliant | |

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| 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).<br>Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. | Compliant | |
| 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.<br>A risk analysis shall be conducted to ensure food contamination risks are mitigated. | Compliant | |
| 11.1.2.6 | | Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning.<br>A risk analysis shall be conducted to ensure food contamination risks are mitigated. | Compliant | |
| 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. | Minor | NCm: During the tour it was observed that some windows were broken along the factory, and others were open despite the fact that they were screened. |
| 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. | Compliant | |
| 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). | Compliant | |
| | | | **Summary** | NCm: During the tour it was observed that some windows were broken along the factory, and others were open despite the fact that they were screened. |

## Module 11 - 11.1.3 - Lightings and Light Fittings

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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.<br>Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | Lighting is adequate for the process and products in the factory, in general is well iluminated, and the lights are shattered. |

## Module 11 - 11.1.4 - Inspection/ Quality Control Area

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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:<br>i. Have easy access to handwashing facilities;<br>ii. Have appropriate waste handling and removal; and<br>iii. Be kept clean to prevent product contamination. | Compliant | |
| | | | **Summary** | There is an on-site laboratory performing quality testing, not food safety, specially to assure the productivity of the factory. No risk posed to the product. |

## Module 11 - 11.1.5 - Dust, Insect, and Pest Proofing

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br>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. | Minor | NCm: During the tour it was observed that some birds have access to the internal part of the factory, having some access to what is so called GMP area. |
| 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:<br>i. A self-closing device;<br>ii. An effective air curtain;<br>iii. A pest-proof screen;<br>iv. A pest-proof annex; and<br>v. Adequate sealing around trucks in docking areas. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | In general the plant is adequate to the nature of the process and product, except by the following violations. / NCm: During the tour it was observed that some birds have access to the internal part of the factory, having some access to what is so called GMP area. |

## Module 11 - 11.1.6 - Ventilation

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.1.6.1 | | Adequate ventilation shall be provided in enclosed processing and food handling areas.<br>Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination. | Compliant | |
| 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. | Compliant | |
| 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). | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | The site is very well ventilated. In fact the intial processes are open to the sky, which is normal in a sugar production factory. |

## Module 11 - 11.1.7 - Equipment and Utensils

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.1.7.1 | | Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |

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| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| | | **Summary** | Equipment and utensils are adequate, some of them are relatively old but still working and in adquate maintenance, and there is a plan for replacement that was reviewed by the auditor. |

## Module 11 - 11.1.8 - Grounds and Roadways

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.1.8.3 | | Paths from amenities leading to site entrances shall be effectively sealed. | Compliant | |
| | | | **Summary** | The plant is stand-alone in a rural part of California, the paths and ways are adequate for loading and unloading and to not present a risk for the product. |

## Module 11 - 11.2.1 - Repairs and Maintenance

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 11.2.1.4 | | Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |

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| **Summary** | 5.6 Facility and Equipment Maintenance, 5.6.1. Purpose. The purpose of this policy is to define quality-related requirements pertaining to equipment maintenance. These are designed to prevent or minimize equipment failures and to ensure that maintenance and repair activities will be carried out in a manner that reduces risk of product, packaging, or equipment contamination. 5.6.2. Policy: The Company ensures that partner Facilities take appropriate measures to prevent equipment and maintenance activities from becoming potential sources of contamination. Based on risk, quality requirements for maintenance are implemented in GMP-designated areas. the company recommends that Partner Facilities maintain local preventive maintenance procedures based on their operations, equipment, and historical evidence. Sample of a work order was reviewed: Requested: Work Order 86680, Requested: 3/25/2023, Priority/Type: Planned Maintenance / Silo. Reason: Safety, Manifest, 007 Days, Inspection. Start Date: 2/28/2023. Description: All items on the list below must be checked. Mark the appropriate boxes (complete for OK, fail for repair needed). And there comes a list of items, i.e.: Limit switches, observe maniff in operation for visible defects, belt (look for cults or damage) etc. Auditor could review the SMBSC FR21-FY27 Consolidated CAPEX-Lease Plan at 04.30.23, Details - Current Long Range Plan - Subject to Change, and for year 2024 they are planning some changes and improvement of equipment: Beet Waste Management Upgrade, Silo Dust Collector, Polarizer, Factory Freight Elevator, etc. |

## Module 11 - 11.2.2 - Maintenance Staff and Contractors

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.2.2.1 | | Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3). | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| **Summary** | | | | Maintenance personnel and contractors are trained on GMP and follow established GMPs when working in GMP-designated areas. Mechanics are included in annual GMP training as outlined in Policy 5.2. Employee Food Safety & Quality Training. Mechanics are instructed to report and document when performing maintenance in GMP areas and when maintenance activities present risks to food safety and/or quality. In addition, personnel performing maintenance on equipment in GMP areas maintain clean tools suitable for product contact equipment. The practitioner commented about the process when the external maintenance provided comes, i.e. welders: they attend a video for GMP training and fill some forms in regard to safety and GMPs prior to enter the facility. |

## Module 11 - 11.2.3 - Calibration

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.2.3.3 | | Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule. | Compliant | |
| 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. | Compliant | |
| 11.2.3.5 | | Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use. | Compliant | |
| 11.2.3.6 | | A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained. | Compliant | |

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| | | | **Summary** | 5.5. Equipment Calibration: Food Safety. 5.5.1. Purpose. The purpose of this policy is to define the calibration program for equipment relating to food safety and Partner Facilities' Hazard Analysis and Critical Control Point (HACCP) programs. Related items include metal detectors, magnets, and temperature probes for wash bays. This policy doe snot apply to filters for liquid sucrose. 5.5.2. Policy. The Company and Partner Facilities install and maintain devices for food safety that include metal detectors and magnets. To ensure these devices are effective, Partner Facilities include calibration as pre-requisite program and periodically verify the effectiveness. There are 7 metal detectors in this facility, 1 of them is a spare. During the audit tour the auditor verified one of these detectors, and the calibration certificate was also verified: Mettler Toledo, Metal Detection PV Certificate: Location: 50 lb. bag line, Certificate date: 23-Feb-2023, Next Certificate Due: 23-Feb-2024. Another sample taken in regard to scales: LEFT COAST -scale services-, Smarter Cert Data Page Device Setup Initial Calibration Certificate. Date: 3/1/23. |

## Module 11 - 11.2.4 - Pest Prevention

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.2.4.1 | | A documented pest prevention program shall be effectively implemented. It shall:<br>i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program;<br>ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;<br>iii. Outline the methods used to prevent pest problems;<br>iv. Outline the pest elimination methods and the appropriate documentation for each inspection;<br>v. Outline the frequency with which pest status is to be checked;<br>vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map;<br>vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available;<br>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;<br>ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and<br>x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends. | Compliant | |
| 11.2.4.2 | | Pest contractors and/or internal pest controllers shall:<br>i. Be licensed and approved by the local relevant authority;<br>ii. Use only trained and qualified operators, who comply with regulatory requirements;<br>iii. Use only approved chemicals;<br>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;<br>v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments;<br>vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and<br>vii. Provide a written report of their findings and the inspections and treatments applied. | Compliant | |
| 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. | Compliant | |
| 11.2.4.4 | | Records of all pest control inspections and applications shall be maintained.<br>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.<br>Records shall be kept of the disposal, investigation, and resolution. | Compliant | |
| 11.2.4.5 | | Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site. | Not Applicable | The site does not store pesticides. |
| 11.2.4.6 | | No animals shall be permitted on-site in food handling and storage areas. | Compliant | |
| | | | **Summary** | The site has a contractor for pest control: Terminix of imperial valley written plan for pest control Spreckels Sugar. The assessment, monitoring, and management of pest activity to identify, prevent and eliminate condition that could promote or sustain a pest population. Use of pesticides is pursued judiciously, using the "least" toxic options wherever possible. It is remarkable that the pest controller documentation includes the SQF code, particularly the element in regard to Pest Prevention. Structural Pest Control Board, Issuance Date: January 15, 2013, Expiration date: June 30, 2024; Current date/time: October 7, 2022. License Relationships: Name: Terminix International Co LP, License / Registration Type: Company Registration, License number: 801, Primary Status: clear, Name: AA1 Pest Control. Common Used Pesticides at this Facility: First Strike Sulf Bait (mice, rats), Tempo SC Ultra (ants, crickets, cockroaches, beetles, spiders), etc. Revised January 3, 2023. Trend analysis was reviewed by the auditor: Trending Report 1, Exterior rodent control, Locations: break room, safety, tar lab, pulp, WHSE, Sewer pump. Three is a map with the location of the traps: Rodent Control Device Location Map. |

## Module 11 - 11.2.5 - Cleaning and Sanitation

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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:<br>i. What is to be cleaned;<br>ii. How it is to be cleaned;<br>iii. When it is to be cleaned;<br>iv. Who is responsible for the cleaning;<br>v. Validation of the cleaning procedures for food contact surfaces (including CIP);<br>vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and<br>vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program. | Compliant | |
| 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:<br>i. The site maintains a list of chemicals approved for use;<br>ii. An inventory of all purchased and used chemicals is maintained;<br>iii. Detergents and sanitizers are stored as outlined in element 11.6.4;<br>iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and<br>v. Only trained staff handle sanitizers and detergents. | Compliant | |
| 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. | Compliant | |
| 11.2.5.4 | | Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained. | Not Applicable | No CIP systems are used here. |
| 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. | Compliant | |
| 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,<br>equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required. | Compliant | |
| 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<br>of production. Pre-operational inspections shall be conducted by qualified personnel. | Compliant | |
| 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. | Compliant | |
| 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.<br>A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained. | Compliant | |
| | | | **Summary** | 5.7. Cleaning, Sanitation, & Waste Management. The purpose of this policy is to define cleaning, sanitation, and waste management requirements for Partner facilities to protect the value of our products, meet FDA regulations, an ensure customer satisfaction. 5.7.2. Policy: The Company and Partner 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 where applicable: 5.7.21. Non-GMP Area Cleaning: Facilities containing non-GMP areas such as factory beet ends, flat storage warehouses, staff amenities, grounds, etc. maintain these areas in a hygienic manner to the extend possible to prevent cross contamination with GMP areas, risks to product or packaging or risks to personnel that might work in GMP areas. MSS are required for staff amenities, but all other non-GMP area do not require master sanitation schedules unless the need is determined by the Facility. Cleaning of these areas is verified through routine inspection. 5.7.2.2. Dry Cleaning: Moisture sensitive environments such as sugar warehouse or granulated sugar handling areas employ dry cleaning techniques to lit microbial proliferation. Dry cleaning involves a top-down approach and includes vacuuming, sweeping, and other means to keep floor, walls, and equipment surfaces clean. As samples of implementation, the auditor reviewed some records: Brawley Silo Master Tuesday Cleaning Schedule, 4/25/2023. and other from different date: 4/24/2023. |

## Module 11 - 11.3.1 - Personnel Welfare

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br><br>Code Amendment #1<br>A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces. | Compliant | |
| 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.<br>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. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | 5.3. Personnel Practices, 5.3.1. Purpose. The purpose of this policy is to outline the health and hygiene-related requirements for personnel working in designated GMP areas. These practices ensure compliance with certification standards, federal food regulations, and customer expectations 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. |

## Module 11 - 11.3.2 - Handwashing

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.3.2.1 | | All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors:<br>i. On entering food handling or processing areas;<br>ii. After each visit to a toilet;<br>iii. After using a handkerchief;<br>iv. After smoking, eating, or drinking; and<br>v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material. | Compliant | |
| 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.<br>Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: | Compliant | |
| 11.3.2.3 | | i. A potable water supply at an appropriate temperature;<br>ii. Liquid soap contained within a fixed dispenser;<br>iii. Paper towels in a hands-free cleanable dispenser; and<br>iv. A means of containing used paper towels. | Compliant | |
| 11.3.2.4 | | The following additional facilities shall be provided in high-risk areas:<br>i. Hands-free operated taps; and<br>ii. Hand sanitizers. | Not Applicable | There are no high risk areas. |
| 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. | Compliant | |
| 11.3.2.6 | | When gloves are used, personnel shall maintain the handwashing practices outlined above. | Compliant | |
| | | | **Summary** | Handwashing stations are strategically located along the facility, and are well equipped with supplies, and with the appropriate signage. |

## Module 11 - 11.3.3 - Clothing and Personal Effects

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.3.3.3 | | Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition. | Compliant | |
| 11.3.3.4 | | Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk. | Compliant | |
| 11.3.3.5 | | Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged.<br>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. | Compliant | |
| 11.3.3.6 | | Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.<br>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. | Compliant | |
| 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. | Compliant | |
| 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.<br>All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management. | Compliant | |
| | | | **Summary** | 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. |

## Module 11 - 11.3.4 - Visitors

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.3.4.3 | | Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | Visitors are invited to sign-up the visitors register, are checked for personel ID and instructed to follow the GMPS. |

## Module 11 - 11.3.5 - Staff Amenities (change rooms, toilet, break rooms)

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.3.5.3 | | High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled. | Not Applicable | There are no high-risk change areas. |

| | | | |
|---|---|---|---|
| 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. | Compliant | |
| 11.3.5.5 | Where required, a sufficient number of showers shall be provided for use by staff. | Not Applicable | The showers are not required in this facility. |
| 11.3.5.6 | Toilet rooms shall be:<br>i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations;<br>ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;<br>iii. Sufficient in number for the maximum number of staff;<br>iv. Constructed so that they can be easily cleaned and maintained;<br>v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and<br>vi. Kept clean and tidy.<br>Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 11.3.5.9 | Separate break rooms shall be provided away from food contact/handling zones.<br>Break rooms shall be:<br>i. Ventilated and well lit;<br>ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting;<br>iii. Equipped with a sink serviced with hot and cold potable water for washing utensils;<br>iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and<br>v. Kept clean and free from waste materials and pests. | Compliant | |
| 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. | Not Applicable | No outside eating areas in this site. |
| | | **Summary** | 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. |

## Module 11 - 11.4.1 - Staff Engaged in Food Handling and Processing Operations

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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:<br>i. Personnel entry to processing areas shall be through the personnel access doors only;<br>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;<br>iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor;<br>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<br>v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor. | Compliant | |
| 11.4.1.2 | | Personnel working in or visiting food handling or processing operations shall ensure that:<br>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;<br>ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food;<br>iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed.<br>iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed.<br>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. | Compliant | |
| 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. | Compliant | |

| | | | |
|---|---|---|---|
| 11.4.1.4 | In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure:<br>i. Food safety is not compromised;<br>ii. Sensory evaluations are conducted by authorized personnel only;<br>iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations;<br>iv. Sensory evaluations are conducted in areas equipped for the purpose; and<br>v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment. | Not Applicable | No sensory evaluations are used in this site. |
| | | **Summary** | 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. |

## Module 11 - 11.5.1 - Water Supply

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | Company would truck it in by using cisterns. |
| 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. | Compliant | |
| 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. | Compliant | |
| 11.5.1.5 | | The use of non-potable water shall be controlled such that:<br>i. There is no cross-contamination between potable and non-potable water lines;<br>ii. Non-potable water piping and outlets are clearly identified; and<br>iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage. | Compliant | |
| 11.5.1.6 | | Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination. | Not Applicable | Water is not stored in the site. |
| | | | **Summary** | The source of water is the COLORADO RIVER, and by using canals they move the water form the river to the plant. There is a pump-house doing this. In element 11.5.3. it is mentioned that they test water from the internal piping system, and from this source is the outcoming laboratory report. |

## Module 11 - 11.5.2 - Water Treatment

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.5.2.1 | | Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. | Compliant | |
| 11.5.2.2 | | Water treatment equipment shall be monitored regularly to ensure it remains serviceable.<br>Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1). | Compliant | |
| 11.5.2.3 | | Treated water shall be regularly monitored to ensure it meets the specified indicators.<br>Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept. | Compliant | |
| | | | **Summary** | There is a basic treatment about chlorine and UV light. Reports of the monitoring of chlorine were reviewed by the auditor, i.e. Month: March 2023. Cl2: 1.2, 1.25, 1.6 in different days of the week, in ppm. |

## Module 11 - 11.5.3 - Water Quality

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|

| | | | |
|---|---|---|---|
| 11.5.3.1 | Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for:<br>i. Washing, thawing, and treating food;<br>ii. Handwashing;<br>iii. Conveying food;<br>iv. An ingredient or food processing aid;<br>v. Cleaning food contact surfaces and equipment;<br>vi. The manufacture of ice; or<br>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. | Compliant | |
| 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. | Compliant | |
| 11.5.3.3 | Water and ice shall be analyzed using reference standards and methods. | Compliant | |
| | | **Summary** | Clinical Laboratory of San Bernardino, Inc. Reported: 02/04/22. Also the IEH Laboratories & Consulting Group, Certificate of Analysis, Report No. IAL-38907, Report date: 5/31/2022, all the analytes within the limits, including Mercury, Lead, Cadmium and Arsenic. This is an accredited laboratory, evidence of the certification was reviewed by auditor: ANAB certificate of accreditation Expiry Date: 02 June 2023, Certificate Number: AT-1956. |

## Module 11 - 11.5.4 - Ice Supply

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.5.4.1 | | Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1. | Not Applicable | They do not use ice in process. |
| 11.5.4.2 | | Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate. | Not Applicable | They do not use ice in process. |
| 11.5.4.3 | | Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution. | Not Applicable | They do not use ice in process. |
| | | | **Summary** | They do not use ice in process. |

## Module 11 - 11.5.5 - Air and Other Gasses

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.5.5.1 | | Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety. | Not Applicable | They do not use air or other gases in process. |
| 11.5.5.2 | | Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually. | Not Applicable | They do not use air or other gases in process. |
| | | | **Summary** | They do not use air or other gases in process. |

## Module 11 - 11.6.1 - Receipt, Storage and Handling of Goods

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 11.6.1.3 | | The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented. | Compliant | |

| | | | |
|---|---|---|---|
| 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. | Compliant | |
| 11.6.1.5 | Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety. | Compliant | |
| 11.6.1.6 | Records shall be available to verify the effectiveness of alternate or temporary control measures for the storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products. | Compliant | |
| | | **Summary** | Receiving Facility Responsibilities: Managers of receiving facilities are responsible for only accepting product, ingredients, and packaging from approved suppliers. Regulations and the Company do not permit receiving goods from non-approved suppliers without additional actions. Acknowledgement and Review of Supply-Chain Program: Receiving facilities acknowledge approved suppliers during the supply-chain management portion of the annual food safety plan review. This review is indicated by a signature on the food safety plan. Documented Receiving Procedures: Receiving facilities inspect incoming materials in accordance with local procedures or those outlined in their respective food safety plan. Procedures require facilities to ensure incoming materials arrived with tamper-evident seals, inspect them for suitability, and that they are sourced from approved suppliers. Receiving facilities communicate food safety and quality issues associated with incoming sugar to NSM Quality Assurance for complaint tracking / trending. |

## Module 11 - 11.6.2 - Cold Storage, Freezing and Chilling of Foods

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.6.2.1 | | The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and be easily accessible for inspection and cleaning. | Not Applicable | The site does not have cold storage. |
| 11.6.2.2 | | Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas. | Not Applicable | The site does not have cold storage. |
| 11.6.2.3 | | The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures. | Not Applicable | The site does not have cold storage. |
| 11.6.2.4 | | Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system. | Not Applicable | the site does not have cold storage. |
| | | | **Summary** | The site does not have cold storage. |

## Module 11 - 11.6.3 - Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | Storage of dry ingredients, packaging materials, and other aids of processing is adequate for the nature of the products being manufactured and the processes. |

## Module 11 - 11.6.4 - Storage of Hazardous Chemicals and Toxic Substances

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|

| | | | |
|---|---|---|---|
| 11.6.4.1 | Hazardous chemicals and toxic substances with the potential for food contamination shall be:<br>i. Clearly labeled, identifying and matching the contents of their containers;<br>ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and<br>iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff. | Compliant | |
| 11.6.4.2 | Storage of hazardous chemicals and toxic substances shall be:<br>i. Located in an area with appropriate signage indicating that the area is for hazardous storage;<br>ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals;<br>iii. Adequately ventilated;<br>iv. Stored where intended and not comingled (e.g., food versus non-food grade);<br>v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and<br>vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces.<br>Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances. | Compliant | |
| 11.6.4.3 | Hazardous chemicals and toxic substances shall be correctly labeled and:<br>i. Used only according to manufacturers' instructions;<br>ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-InProgress, finished product, or product contact surfaces;<br>iii. Returned to the appropriate storage areas after use; and<br>iv. Be compliant with national and local legislation. | Compliant | |
| 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. | Compliant | |
| 11.6.4.5 | Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,:<br>i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use;<br>ii. Be provided first aid equipment and personnel protective equipment (PPE); and<br>iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements. | Compliant | |
| 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:<br>i. Not reused;<br>ii. Segregated and securely stored prior to collection; and<br>iii. Disposed through an approved vendor. | Compliant | |
| 11.6.4.7 | In the event of a hazardous spill, the site shall:<br>i. Have spillage clean-up instructions to ensure that the spill is properly contained; and<br>ii. Be equipped with PPE, spillage kits, and cleaning equipment. | Compliant | |
| | | **Summary** | Chemical products are handled adequately. For instance in the maintenance workshop they have the lubricants and they are under control. There are chemicals used as aids of process and they are adequately stored. |

## Module 11 - 11.6.5 - Loading, Transport, and Unloading Practices

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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.<br>Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 11.6.5.4 | | Loading and unloading docks shall be designed to protect the product during loading and unloading.<br>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. | Compliant | |
| 11.6.5.5 | | Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable. | Not Applicable | They do not use refrigerated units. |
| 11.6.5.6 | | The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit. | Not Applicable | They do not use refrigerated units. |

| | | | |
|---|---|---|---|
| 11.6.5.7 | On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading. | Not Applicable | They do not use refrigerated units. |
| 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. | Compliant | |
| | | **Summary** | 5.13. Dry Van Trailers & Container Standards. 5.13.1. Purpose. The purpose of this policy is to define the food safety and quality-specific requirements relating to the transportation of granulated sugar via dry van trailers and intermodal containers. Adherence to these requirements mitigate food safety and quality assurance risks. 5.13.2. Policy. The company transports sugar products via dry van trailers and containers. These are either shipped directly or piggyback transportation. Partner Facilities ensure that warehouse docks, equipment, and receiving/loading practices do not cause product contamination or degradations by meeting the following requirements: 5.13.2.1. Warehouse Dock & loading Facilities: warehouse personnel ensure that truck docks and loading areas are clean and do not present dangers to packaged products or incoming materials. |

## Module 11 - 11.7.1 - High-Risk Processes

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.7.1.1 | | The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized. | Not Applicable | There are no high-risk processes in this facility. |
| 11.7.1.2 | | Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety. | Not Applicable | There are no high-risk processes in this facility. |
| 11.7.1.3 | | Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function. | Not Applicable | There are no high-risk processes in this facility. |
| 11.7.1.4 | | Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination. | Not Applicable | There are no high-risk processes in this facility. |
| 11.7.1.5 | | Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination. | Not Applicable | There are no high-risk processes in this facility. |
| | | | **Summary** | There are no high-risk processes in this facility. |

## Module 11 - 11.7.2 - Thawing of Food

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 11.7.2.1 | | Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed. | Not Applicable | No thawing of food in this site. |
| 11.7.2.2 | | Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination. | Not Applicable | No thawing of food in this site. |
| 11.7.2.3 | | Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product. | Not Applicable | No thawing of food in this site. |
| | | | **Summary** | No thawing of food in this site. |

## Module 11 - 11.7.3 - Control of Foreign Matter Contamination

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |

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|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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). | Compliant | |
| | | **Summary** | 5.9. Physical Contaminant Control. 5.9.1. Purpose. The purpose of this policy is to define programs, practices, and equipment employed to ensure finished products are free of foreign matter. 5.9.2. Policy. The Company and Partner Facilities' physical contaminant control program minimizes risks of foreign matter contamination to ensure the final products are free from extraneous material. This program contains methods for prevention, monitoring / control, and instruction for reporting potential contamination incidents. This program functions in conduction with Facilities' hazard analysis and critical control point (HACCP) plans. Sample of records of the control of wooden pallets that are store in the exterior of the plant were reviewed by auditor: Pallet Inspection Log - WH Supply. Date: 4-11-23, shift 1, Time: 8.10 am. Same report but dated on 4-10-23. |

## Module 11 - 11.7.4 - Detection of Foreign Objects

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| | | | **Summary** | Screening and Metal Detection of Sugar Products. All sugar products of National Sugar marketing ("NSM") are screened prior to bulk loading or packaging. As the sugar is drawn from storage and conditioning it passes over a 10 - 12 mesh screen to remove any lumps that may have formed in storage. The nominal opening of these screens is around 2 mm. All domestically manufactured sugar also passes through at least one metal detector and rare earth magnet. The sensitivity of the metal detectors is verified using 1.5 mm ferrous, 1.8 mm non-ferrous, 2.0 mm stainless steel and 2.0 mm aluminum test standards. Metal detectors are equipped with automatic rejection devices. The rejected material is then examined to determine type and source of contaminant. During the tour the auditor could verify the functioning of the metal detection systems and they were found to work accordingly. |

## Module 11 - 11.8.1 - Waste Disposal

| Name | Mandatory | Description | Primary Response | Evidence |
|---|---|---|---|---|

| | | | |
|---|---|---|---|
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| 11.8.1.5 | Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | They call them co-products. Hazard Analysis for Animal Feed. Date: 3/17/22. Hazard will be reviewed every 3 years or fi something changes inn the process. Spreckels is relying on its self-risk assessment as stated in FSPCA Preventive Controls for Animal Food (2016). Furthermore, because Spreckels has identified that its dried beet pulp doesn't have a preventive control. |
| 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. | Compliant | |
| 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. | Compliant | |
| 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. | Compliant | |
| | | **Summary** | Waste Management. Facilities control and monitor waste to ensure waste is conveyed, stored, and discarded in such a way to minimize the development of odor, pest attractant, harborage, and to protect against contamination of product, product contact surfaces, water supplies, and ground surfaces. Facilities implement the following to ensured waste does not affect product quality or safety. Waste receptables: waste bins are only used for their intended purpose. The company prohibits the use of packaging materials for waste containment or storage unless the Facility defaces the packaging tow here there is no possibility for inadvertent use for finished product. |

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| **Audit** | **SQF Food Safety Audit Edition 9** |
| **Company Name** | **Spreckels Sugar Company** |
| **Company Number** | **9451** |
| **Audit Number** | **178974** |
| **Company Address** | **395 W Keystone Road PO Box 581** |
| | **Brawley, CA 92227** |
| | **United States** |
| **Food Sector Categories** | **19. Food Ingredient Manufacturing** |
| **Score** | **98** |

## Corrective Actions

| Name | Evidence | Primary Response | Root Cause | Corrective Action | Completion Date | Verification of Close Out | Close Out Date |
|---|---|---|---|---|---|---|---|
| 11.1.2.7 | NCm: During the tour it was observed that some windows were broken along the factory, and others were open despite the fact that they were screened. | Minor | There is no infrastructure monthly inspection program in the factory during inter-campaign or prior to start-up, thus, during the tour of the SQF audit, the auditor observed some windows that were broken along the north side of the factory, and others were open despite the fact that they were screened. | **1.** Windows have been repaired on 5/09/2023.<br>**2.** Implement a monthly infrastructure inspection program in the factory during inter-campaign. | 1. Completed on 5/10/2023<br>2. Completed on 5/30/2023 | The site presented the SMBSC Root Cause Analysis (RCA) Form, with all the root cause analysis, containment action, and corrective action to prevent the recurrency in the problem. The actions taken will be verified during the next certification audit. | 05/30/2023 |
| 11.1.5.1 | NCm: During the tour it was observed that some birds have access to the internal part of the factory, having some access to what is so called GMP area. | Minor | There is no infrastructure monthly inspection program in the factory during inter-campaign, thus, During the tour of the SQF audit, the auditor observed that some birds have access to the internal part of the factory, potentially having some access to what is so-called GMP area. | **1.** Windows have been repaired on 5/09/2023.<br>**2.** Implement a monthly infrastructure inspection program in the factory during inter-campaign. | 1. Completed on 5/10/2023<br>2. Completed on 5/30/2023 | The site presented the SMBSC Root Cause Analysis (RCA) Form with evidence that the windows have been repaired, and also the implementation of monthly infrastructure inspections. The effectiveness of this actions will be verified during the next audit. | 05/30/2023 |

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|---|---|
| **Audit** | **SQF Food Safety Audit Edition 9** |
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| | **Brawley, CA 92227** |
| | **United States** |
| **Food Sector Categories** | **19. Food Ingredient Manufacturing** |
| **Score** | **98** |

## Certification Information

| Data | Result |
|---|---|
| Certification Body Name | **CICS Americas Inc.** |
| Certification Body Address | **8350 Ashlane Way Suite 104, The Woodlands, TX 77382, United States** |
| Certification Body Number | **CB-1-CICS** |
| Accreditation Body Name | **ANSI** |
| Accreditation Body Number | **1087** |
| Certificate Number | 9451 |
| Audit Type | Unannounced |
| Select Site? | No |
| Audit Start Date | 9-May-23 |
| Audit End Date | 10-May-23 |
| Food Sector Category: | 19. Food Ingredient Manufacturing |
| Products: | Granulated Sugar |
| Scope of Certification: | Granulated Sugar |
| Lead Auditor Name: | Luis Palacios |
| Lead Auditor Number: | 124403 |
| Audit Team Members: | |
| Technical Expert | |
| Technical Reviewer Name: | Cesar Hernandez |
| Technical Reviewer Number: | 120868 |
| Hours Spent on Site: | 16 |
| Hours of ICT Activities: | 0 |
| Hours Spent Writing Report: | 8 |
| Score | 98 |
| Rating | Excellent |
| Audit Decision: | Certified |
| Decision Date: | June 20, 2023 |
| Issue Date: | June 20, 2023 |
| Re-certification Date: | May 29, 2024 |
| Expiration Date: | August 12, 2024 |
| Surveillance Audit Date | |