



SQF Food Safety Audit Edition 9

National Sugar Marketing - Grand Prairie

Summary

AUDIT DECISION

CERTIFIED

CERTIFICATION NUMBER

75051 | 50389

AUDIT RATING



Excellent

DECISION DATE

06/20/23

AUDIT TYPE

INITIAL CERTIFICATION

RECERTIFICATION DATE

05/31/24

AUDIT DATES

05/31/23 - 05/31/23

EXPIRATION DATE

08/14/24

ISSUE DATE

06/20/23

Facility & Scope

National Sugar Marketing - Grand Prairie

721 S Parkway Dr., Grand Prairie, TX 75051

Food Sector Categories:

26. Storage and Distribution

Products:

Sugar

Scope of Certification:

Sugar

Certification Body & Audit Team

CICS Americas Inc.

8350 Ashlane Way Suite 104, The Woodlands, TX,
77382, United States

CB#: CB-1-CICS

Accreditation Body: ANSI

Accreditation Number: 1087

Lead Auditor: Rodolfo Gonzalez (204793)

Technical Reviewer: Luis Palacios (124403)

Hours Spent on Site: 8

Hours of ICT Activites: 0

Section Responses

Audit Statement	Audit
SQF Practitioner Name	<p>Name the designated SQF Practitioner</p> <p>RESPONSE: ALEXANDRIA SPENCER</p>
SQF Practitioner Email	<p>Email of the designated SQF Practitioner</p> <p>RESPONSE: ASPENCER@NATSUGAR.COM</p>
Opening Meeting	<p>People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p>RESPONSE: ALEXANDRIA SPENCER: WAREHOUSE MANAGER, MIA BURNS: QUALITY ASSURANCES SPECIALIST, REUBEN GONZALEZ: DIRECTOR OF WAREHPUSING, RODOLFO GONZALEZ: SQF AUDITOR.</p>
Facility Description	<p>Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)</p> <p>RESPONSE: THE GRAND PRAIRIE FACILITY IS A FLAT STORAGE WAREHOUSING OPERATION. THIS FACILITY CAN RECEIVE DRY VAN TRAILER AND BOXCAR SHIPMENTS. AFTER STORAGE, THIS FACILITY SHIPS THE PRODUCT VIA A DRY VAN TRAILER. BOXCAR SHIPMENTS ARE UTILIZED TO TRANSPORT REMELT SUGAR BACK TO THE BEET REFINERIES FOR REPROCESSING. THE UPDATED FACILITY SPACE IS 88,339 FT2. THE HOURS OF OPERATION ARE 5 DAYS A WEEK WITH TWO OVERLAPPING SHIFTS FROM 6:30 AM TO 3:00 PM AND 7:00 AM TO 3:30 PM. THERE ARE 8 FULL-TIME EMPLOYEES AND THE USE OF TEMPORARY LABOR WHEN NEEDED. THE FACILITY WAS CONSTRUCTED IN 1976.</p>
Closing Meeting	<p>People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p>RESPONSE: ALEXANDRIA SPENCER: WAREHOUSE MANAGER, MIA BURNS: QUALITY ASSURANCES SPECIALIST, REUBEN GONZALEZ: DIRECTOR OF WAREHPUSING, RODOLFO GONZALEZ: SQF AUDITOR.</p>
Auditor Recommendation	<p>Auditor Recommendation</p> <p>RESPONSE: PROCEED WITH THE CERTIFICATION.</p>

2.1.1 Management Responsibility

The facility has a food safety Policy Statement that is entitled "Food Safety and Quality Statement" (dated 2022-08-10). This statement has been implemented by senior management and signed by the CEO. The Policy statement covers customer and regulatory requirements, establishing and maintaining a food safety culture, and the use of continuous improvement of the system. The Policy is communicated to the facility's staff by way of posting in the lunch room and several offices. The policy was in English. There is an annual refreshing training was carried during october and the last hiring process was carried out on 2023-03-24.

A food safety culture plan on place was in place base on . Plant staff is required to report food safety issues to management and are empowered to make decisions regarding food safety, as evidenced by the job descriptions and interviews with employees. The training program was in place for regulatory and food safety responsibilities. Adequate resources were in place for the maintenance of the SQF system. Food safety objectives were established for Customer response 99.5%; shipments rate 99.9%, Cost per CWT 13w than \$0.03. Capitanin inspection, results analysis meeting and results were used to implemente strategies to improve the Food Safety Culture. These were presented to the employees in January 2023. These were reviewed in the monthly reports from corporate.

The organizational chart, a live corporate document, is kept on file electronically and maintained by Plant Manager. The chart outlined the structure of staff. The local chart (dated 2023-04-25) noted those that are responsible for food safety, showing the alternates and the SQF practitioners. There were two positions for SQF practitioners which were the Warehouse Manager. Both had third-party HACCP training on file dated 2022-10-25 and the substitute 2023-03-20. The SQF Practitioner is responsible for the development, implementation, and maintenance of the SQF System. Job descriptions (D-AD-004, dated 2023-04-25) for the Warehouse Lead, Warehouseman and the Shipping employee were reviewed. The company had a sister facility that produced the same products which ensured continued production in the event of organizational or personnel changes within the company which was addressed in the Crisis Management Plan. This was an not unannounced audit. The company does not have blackout dates.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to:

- i. Supply safe food;
- ii. Establish and maintain a food safety culture within the site;
- iii. Establish and continually improve the site's food safety management system; and
- iv. Comply with customer and regulatory requirements to supply safe food.

The policy statement shall be:

- v. Signed by the senior site manager and displayed in prominent positions; and
- vi. Effectively communicated to all site personnel in language(s) understood by all site personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum:

- i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures;
- ii. Adequate resources are available to meet food safety objectives;
- iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;
- iv. Staff are informed and held accountable for their food safety and regulatory responsibilities;
- v. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and
- vi. Staff are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.3 The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel.

Job descriptions for the key personnel shall be documented.

Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.4 Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to:

- i. Oversee the development, implementation, review, and maintenance of the SQF System;
- ii. Take appropriate action to ensure the integrity of the SQF System; and
- iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.5 The primary and substitute SQF practitioner shall:

- i. Be employed by the site;
- ii. Hold a position of responsibility in relation to the management of the site's SQF System;
- iii. Have completed a HACCP training course;
- iv. Be competent to implement and maintain HACCP-based food safety plans; and
- v. Have an understanding of the SQF Food Safety Code: Storage and Distribution and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2 Management Review

The entire SQF System is to be reviewed at least annually according to the “Management Review, section 1.5” (dated 06/14/2022) which included food safety culture, food safety objectives, and any changes to the SQF system. Food safety fundamentals and the food safety plans are to be reviewed by management when any changes are made in products and systems. The SQF practitioner is responsible for maintaining records of all reviews, validations, and changes to the SQF System. The monthly management meetings took place to ensure communication on matters impacting the SQF system (most weeks with meetings for food safety, objectives, and generally at least once a month). These were reviewed from January to , 2023. Full annual management review meeting notes were reviewed dated 2023-04-11.

2.1.2.1

The SQF system shall be reviewed by senior site management at least annually and include:

- i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan);
- ii. Food safety culture performance;
- iii. Food safety objectives and performance measures;
- iv. Corrective and preventative actions, and trends in findings from internal and external audits, customer complaints, and verification and validation activities;
- v. Hazard and risk management system; and
- vi. Follow-up action items from previous management review.

Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2.2

The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3 Complaint Management

The written Complaint policy is entitled “Customer Complaints” (dated 10/22/2022). It defines the methods and responsibilities for handling customer complaints. Complaints are received by several departments and investigated by the Quality Manager. A monthly review with trend analysis is required by the facility. Results through 2022 were reviewed, and there were 2 complaints in 2022. There were not any significant trends. Corrective actions, investigations, root cause, and records are required to be kept of each complaint. Example QA complaints were reviewed C22014, dated 2022-02-10 for order error this order which had an investigation, corrective actions, and root cause on file.

2.1.3.1

The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products stored or handled on-site shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3.2 Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1 Food Safety Management

A food safety manual has been developed and is maintained electronically. Policies and procedures are documented in the manual and outline how the SQF Code is met. The food safety manual contains the scope of the certification, a list of products and processes in the scope, the organizational chart, all food safety policies and procedures that make up the SQF System, reference to the raw material, packaging and finished product specifications, process controls that impact food safety and the food safety regulations that apply to the manufacturing site. It is made available to all relevant staff by means of access to the quality department or electronic read only. Changes to the system were to be validated or justified. There had not been any changes implemented that had an impact on the site's ability to deliver safe food.

2.2.1.1 The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Storage and Distribution shall be maintained in electronic and/or hard copy documentation. It will be made available to relevant staff and include:

- i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;
- ii. The food safety policy statement and organization chart;
- iii. The processes and products included in the scope of certification;
- iv. Food safety regulations that apply to the site and to the country of sale (if known);
- v. Raw material, ingredient, packaging, and finished product specifications;
- vi. Food safety procedures, pre-requisite programs, food safety plans;
- vii. Process controls that impact product safety; and
- viii. Other documentation necessary to support the development and the implementation, maintenance, and control of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1.2 Food safety plans, Good Storage and Distribution Practices and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food.

All changes to food safety plans, Good Storage and Distribution Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the changes shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2 Document Control

The facility has implemented its policy “Document Control, section 2.0” (dated 06/14/2022), defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. No issues were noted with randomly selected documents throughout the audit.

2.2.2.1 The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented.

Current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3 Records

The facility has implemented its policy for verifying and retaining records in the document called “Document Control, section 2.0” (dated 06/14/2022). The facility has documented procedures for recording production and quality monitoring as well as the proper correcting and initialing of errors. These are based on company and regulatory requirements. Records are retained for at least the shelf life on-site according to the procedure for all products. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage, and have documented retention times. The retention time for records was past the determining shelf life of the product.

2.2.3.1 The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3.2 All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities have been completed.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3.3 Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf life, or established by the site if no shelf life exists.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1 Product for Storage and Distribution

There is an agreement between companies that consider the requirements for received, stored, and intended for distribution signed on 2021-0601 and in the “Product Storage & warehousing, section 5.10” (dated 06/13/2022) outlined the storage requirements for raw materials, work in process, and finished products.

2.3.1.1 Product handling and storage requirements for all products received, stored, and intended for distribution, shall be documented, current, approved by the site and their customer (if applicable), accessible to relevant staff, and include temperature requirements, storage conditions, packaging requirements, and handling and transportation conditions.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2 Supplier Approval and Incoming Supplies

The facility has a written supplier approval program in "Supplier Approval, section 5.18" (dated 06/14/2022), which has been implemented and covers the procedures for approving suppliers of pallet and serices. The policy includes specifications, the level of risk to the facility and how approved supplier status is granted, and the food fraud assessment and mitigation plan. Also included are methods to review the approved supplier performance and status. Emergency suppliers were allowed with upper management approval, however, none had been used in the past year. A register is maintained of all current approved suppliers, which was reviewed during the audit and found to be complete. Raw materials found in the storage warehouse (sugar beet) were verified to have come from suppliers on the Approved Supplier List.

2.3.2.1 The methods and responsibility for developing and approving product descriptions shall be documented. Product descriptions for all incoming supplies used by the site but not intended for distribution, including, but not limited to hazardous chemicals, ice, food packaging materials, or janitorial supplies that are used on-site and impact on product safety shall be documented and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.2 All incoming supplies shall comply with the relevant legislation.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.3 Incoming supplies shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of incoming materials shall include a review of the product description to determine conformance.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.4 Incoming goods that may have an impact on product safety shall be supplied by an approved supplier. The responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.5 Incoming goods received in emergency situations shall be acceptable provided they are inspected or analyzed before use and the supplier has been evaluated.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.6 Incoming goods and packaging received from other sites under the same corporate ownership shall be subject to the same product requirements and approved supplier requirements as all other material providers.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.7 Specifications, product requirements, and incoming supplies shall be reviewed annually or as changes occur.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Service Providers

The Contract Service Providers were on a master list that had specifications for descriptions of service. A list of current contract service providers is maintained and found to include providers of services including pest control. Contract arrangements for pest control were reviewed during the audit and found to be satisfactory. The contractors were required to undergo training on their first visit to the site as noted on the master list.

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3.2 Contracted services that have an impact on product safety shall be reviewed against the description. The methods and responsibilities for contracted services review shall be documented and validated as needed or at a minimum of annually.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3.3 A record of all contract service descriptions that have an impact on product safety shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4 Contract Third-Party Storage or Distributor

There are no Contract Third-Party Storage or Distributor

2.4.1 Food Legislation

A written Technical, Regulatory & Industry updates is on file. It states that the Quality Assurance Department maintains current copies of all regulations affecting product legality. The site is subscribed to FDA notifications. The Corporate Company is partner with the American Society of Beet Sugar Technologists where the Quality Assurance Manager is an approved Instructor. The Corporate company is also partner with the Sugar Association and the International Society of Beverage Technologists. Additionally, Corporate Quality Assurance posts white papers, peer-reviewed journals, and association publications to a common location. This information includes but is not limited to: • SQF Certification Standard. • SQF Module 2 guidance. • SQF Module 11 guidance. • BRC Standard. • BRC Auditor Guidelines • Codex Standards for Sugar.

2.4.1.1 The site shall ensure that food stored and delivered to customers is handled in a manner that complies with the relevant legislation in the country of its production and destination.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Good Production Practices

The facility has written and implemented those pre-requisite programs (good manufacturing practices in module 12) that are included in the SQF good manufacturing practices that are applicable to the scope of this certification. These food safety pre-requisite programs are found in the manual. The effectiveness of the pre-requisite programs was to be verified based on a schedule.

2.4.2.1 The site shall ensure the Good Storage and Distribution Practices described in Module 12 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 to ensure that food safety is not compromised.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2.2 The Good Storage and Distribution Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Safety Plan

The food safety plans were prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The facility maintains two food safety plans: D-QA-004 Food Safety Plan, dated 2023-01-13, for Storage and Distribution. The multidisciplinary food safety team responsible for maintenance of the food safety plans includes the Warehouse Manager, Warehouse Lead, Administrative Assistant, and QA Specialist. Product descriptions include product names, technical names, product description, ingredients, intended consumers, shelflife, labeling instructions, FDA classification, storage requirements, distribution, technical information (chemical formula, water activity, moisture, sulfites), and preventive controls. The flow diagrams include all processes from receiving to shipping, as well as all inputs (transport boxcars and trailers) and outputs (remelt) and was verified on 2023-02-15. The hazard analyses identify potential biological, chemical, and physical hazards at each process step and for each input. Each of the hazard analysis assessed for likelihood and severity to determine which hazards are significant and must be controlled to ensure food safety. There is not a CCP on site.

2.4.3.1 A hazard and risk management system shall be developed and take into consideration relevant legislation in all countries of operation. The system shall be risk based, systematic and comprehensive, and based on HACCP or preventive controls. The food safety plan shall be effectively implemented, maintained, and outline the means by which 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 food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.2 The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, storage and distribution, and facility /maintenance knowledge of the relevant products and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.3 The scope of each food safety plan shall be developed and documented including the start and endpoint of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.4 Product requirements shall be developed and documented for all products (or groups of products) included in the scope of the food safety plans. This shall reference the product descriptions (refer to 2.3.2.1) plus any additional information relevant to product safety, such as temperature for storage, how the product is packaged, allergen requirements, raw or cooked, etc.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.5 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 material, packaging, service inputs (e.g., water, steam, gases as appropriate), scheduled process delays, and all process outputs including waste, rework, and recoup. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.6 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 food products received and stored.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.7 The food safety team shall conduct a hazard analysis for every identified hazard, to identify which hazards are significant. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.9 Based on the results of the hazard analysis (refer to 2.4.3.7), 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 (e.g., a preventive control {PC} or critical control point {CCP}).

In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

RESPONSE: COMPLIANT

EVIDENCE: There is not a CCP on site

2.4.3.10 For each identified step requiring control (e.g. PC or CCP) the food safety team shall document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated 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 2.5.1.1).

RESPONSE: COMPLIANT

EVIDENCE: There is not a CCP on site

2.4.3.11 The food safety team shall develop and document procedures to monitor identified steps requiring control (e.g. PC or CCP) to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the testing frequency.

RESPONSE: COMPLIANT

EVIDENCE: There is not a CCP on site

2.4.3.12 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 an identified step requiring control (e.g. PC or CCP). The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

RESPONSE: COMPLIANT

EVIDENCE: There is not a CCP on site

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

RESPONSE: COMPLIANT

EVIDENCE: There is not a CCP on site

2.4.4 Non-conforming Product and Equipment

The facility has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, and packaging in the document “Non-confirming Product & Material, section 7.0” (dated 2022-06-14). Methods to segregate, identify, handle and dispose of the product include placing it in the holding area, use of hold tags, and use of status electronically. Nonconforming products or equipment is required to be identified, segregated, or disposed of. Examples of hold records, investigations, corrective actions, and dispositions were reviewed for a customer request hold product, dated on 2023-05-23. Relevant staff is aware of the Hold policy, as evidenced by interviews with QA, warehouse and production employees.

2.4.4.1 The responsibility and methods outlining how non-conforming product, raw materials, ingredients, work-in-progress, packaging, or equipment detected during receipt, storage, handling, or delivery and including food found to be damaged and/or returned from customers is handled shall be documented and implemented. The methods applied shall ensure:

- i. Non-conforming product is quarantined, identified, handled, and / or disposed of in a manner that minimizes the risk of inadvertent use, improper use or delivery, or risk to the integrity of the product;
- ii. Non-conforming equipment is effectively identified, repaired, or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and
- iii. All relevant staff are aware of the organization’s quarantine and release requirements applicable to equipment or product placed under quarantine status.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.5 Product Recoup

There is no product recoup

2.4.6 Product Release

The facility has written procedures in “Positive Release, section 7.3” (dated 06/14/2022) implemented for releasing finished products. The procedure “Positive Release, section 7.3” (dated 06/14/2022) noted the requirements for label compliance with food legislation in the country of manufacture and countries of sale. Record for product release were reviewed during the audit, no deviation were noted. The product is release by a generate a work order.

2.4.6.1 The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.6.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.1 Validation and Effectiveness (Mandatory)

The methods, responsibilities, and criteria for verifying the effectiveness of GSDPs (pre-requisite programs) have been documented and implemented. These are found in “Validation and Verification, section 8.0” (dated 06/14/2022). Records of all verification of effectiveness and validation are maintained by the SQF Practitioner. The validations were required to be completed annually or in the event of changes.

2.5.1.1 The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented, implemented, and effective. The methods applied shall ensure that:

- i. Good Storage and Distribution Practices are confirmed to ensure they achieve the required result;
- ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and
- iii. Changes to the processes or procedures are assessed to ensure controls are still effective.

Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2 Verification Activities (Mandatory)

The methods, responsibility and criteria for verifying the effectiveness of monitoring prerequisite programs critical control points and other food safety controls identified shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record verified. The PPRs validation and verification check were done on 2023-04-11.

2.5.2.1 The methods, responsibility, and criteria for verifying monitoring of Good Storage and Distribution Practices, critical control points, and other food safety controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2.2 A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented.

Records of verification of activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.3 Corrective and Preventative Action

The Corrective and Preventative Action program is written in "Corrective Actions & Root Cause Analysis, section 1.4" (dated 06/14/2022). It describes the methods and responsibilities for investigating, resolving, and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are required to be documented. Records of investigations and corrective actions were reviewed during the audit for internal holds and internal inspections. Corrective actions were maintained in each specific program. These were found to have proper reviews, investigations, corrective and preventative actions, and resolutions documented.

2.5.3.1 The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented.

Deviations from food safety requirements may include customer complaints, non-conformances raised at internal or external audits and inspections, non-conforming product and equipment, or withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4 Internal Audits and Inspections

The procedure for scheduling and conducting internal audits so the effectiveness of the SQF system is verified has been documented and implemented in the document "Internal Auditing & Facility Inspections, section 8.3" (dated 2022-06-03). The Internal Audit Program is maintained by the SQF Practitioner. If there were any changes implemented from the internal audits that have an impact on food safety, it would trigger an SQF review. Facility and equipment inspections, internal audits of the food safety plan, and regulatory inspections are part of the internal audit programs. The frequency of the audits is communicated to management and required weekly for internal inspections and annually for the internal audits. Personnel conducting audits have been properly trained and audit areas independent of their function by using teams. Records of internal inspections in the facility conducted were sampled and reviewed during the audit from January to April. There was an inspection of the outside grounds at least annually and recorded on a log. A full internal audit was completed from 2023-04-25 with records on file. The records showed conformance and nonconformities.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure:

- i. All applicable requirements of the SQF Food Safety Code: Storage and Distribution are audited as per the SQF audit checklist or similar tool;
- ii. Objective evidence is recorded to verify compliance and/or non-compliance;
- iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and
- iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Storage and Distribution Practices and facilities and equipment maintenance are compliant with the SQF Food Safety Code: Storage and Distribution. The site shall:

- i. Take corrections or corrective and preventative action; and
- ii. Maintain records of inspections and any corrective action taken.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.4 Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3.

Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1 Product Identification

A policy defining how products are identified from receipt through production and shipping has been documented in "Product Lot Number, section 4.1" (dated 06/14/2022). The identification system ensures all materials, work-in-progress and finished goods are clearly identified at all stages of their process.

2.6.1.1 The methods and responsibility for identifying products during all stages of storage shall be documented and implemented. The product identification system shall be implemented to ensure:

- i. Proper stock rotation; and
- ii. Accurate location of product.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1.2 Records of product receipt and use and product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.2 Product Trace

A policy defines the methods and responsibilities for tracing products to the customers and from vendors of raw materials and packaging. This is written in "Traceability, section 4.4" (dated 06/14/2022). Receipt dates were recorded and used to help trace the raw materials and packaging materials. The effectiveness of the trace system is required to be conducted at least annually. Records of the receipt, use, and dispatch of products are maintained. Rework is commonly used and recorded on the remelt. The backward and forward trace and recall exercise was completed on 2023-05-01 for the bag, 12/24 lb bag, Lot AN22286 bulk with 100% traced materials within an 84 minutes.

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure:

- i. Traceability of food products to the customer (one step forward);
- ii. Traceability of product to the supplier or manufacturing supplier with date of receipt (one step back);
- iii. Traceability is maintained where product is recouped; and
- iv. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.2).

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3 Product Withdrawal and Recall (Mandatory)

A policy defines the methods and responsibilities for withdrawing and recalling products if necessary and is noted in "Recall, 3.2-01" (dated 01/31/2022). A recall team has been designated and is led by the Quality Manager. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with corrective action. Mock trace exercises are completed at least annually, to verify the effectiveness of the system. Records were reviewed of the recall plan and summaries of the backward and forward trace and recall exercise was completed on 2023-05-01 for the bag, 12/24 lb bag, Lot AN22286 bulk with 100% traced materials within an 84 minutes..The records reviewed for this mock trace exercise showed the Product Withdrawal and Recall procedures were tested effectively forwards to shipping and backward to the raw materials. This included all mock requirements including customer information, scenario, and mock-root cause. Corrective actions were not required as it was successful. There had not been any recalls since the last audit.

2.6.3.1 The responsibility and methods used to withdraw or recall products shall be documented and implemented. The procedure shall:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.2 The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (one back), inhouse identification and isolation/quarantine, and where the product is shipped to (one forward).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.6.4 Crisis Management Planning

The written Crisis Management Plan is found in Document "Business Continuity Plan" (dated 11/16/2021). The plan has been implemented and addresses known threats to the interruption of the business. The plan noted the senior management in charge of crisis including the nomination of a team leader who has oversight of the plan. The local crisis management team identified and trained on 2023-02-08. The plan includes responses to an extended business interruption, isolating and identifying affected products, and a current crisis alert list. The crisis plan includes internal/external communications and sources of legal and expert advice. The mock exercise was completed on 2023-08-02 using a tornado. There were not any gaps in the test that required corrective actions.

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 event, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum:

- i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident;
- ii. The nomination and training of a crisis management team;
- iii. The controls implemented to ensure a response does not compromise product safety;
- iv. The measures to isolate and identify product affected by a response to a crisis;
- v. The measures taken to verify the acceptability of food product prior to release;
- vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;
- vii. Sources of legal and expert advice; and
- viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1 Food Defense Plan

The facility has a Food Defense Policy “Food defense plan” (dated 2023-02-09), in which the methods, responsibilities, and criteria for preventing food adulteration have been documented. A food defense protocol includes the title of the senior management responsible for food defense. This program complied with legislative requirements. The program outlined the access of only authorized personnel, designated access points, the secured storage of materials and hazardous chemicals, and the control of access to contractors and visitors. A current food defense/site security assessment was completed during 2023-02-07. A test of the food defense program was completed on 2023-04-24 base on a breake the security. Food defense training was carried out 2023-03-24.

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1.2 A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum:

- i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;
- ii. The name of the senior site management person responsible for the food defense plan;
- iii. The methods implemented to ensure only authorized personnel have access to equipment and vehicles and storage areas through designated access points;
- iv. The methods implemented to protect sensitive operational points from intentional adulteration;
- v. The measures taken to ensure the secure receipt and storage of products, packaging, equipment, and hazardous chemicals to protect them from deliberate act of sabotage or terrorist-like incidents;
- vi. The measures implemented to ensure products, packaging (including labels), work-in progress, and process inputs are held under secure storage and transportation conditions; and
- vii. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2 Food Fraud

“Food Fraud” (dated 06/10/2022) outlined the requirements for assessment of the raw materials, site vulnerability, and to have mitigation controls. There was a re-assessment summary that was completed on 2022-06-01. There were not any gaps in this risk assessment that needed corrective actions. The risk assessment showed that there were not any high-risk materials and mitigation controls were not required. See 2.9.2.1 for training on food fraud during the year.

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.4 Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1 Allergen Management

Even though there are no allergens present in the plant, there is a documented policy, whose value is to increase awareness and to establish the necessary controls to eliminate the risk that the oil under site’s control is subject to cross-contamination with food allergens. This policy was developed to clearly explain the general procedures and guidelines that apply to the Warehouse employees. This policy is communicated to relevant employees, and all employees are expected to adhere to the standards set forth in this policy. Last Allergen training was carried out on 2023-03-24.

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management controls shall be based on a risk assessment and include the identification, labeling, and handling of allergen-containing product, including product recoup, to prevent inadvertent cross contact.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.2 Recouped product containing food allergens (refer to 2.4.5) shall be repackaged under conditions that ensure product safety and integrity is maintained. Recouped product containing allergens shall be clearly identified and traceable.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.3 Sites that do not handle allergenic materials or store allergenic products shall document, implement, and maintain an allergen management program that addresses, at a minimum, the mitigation of introduced or unintended allergens from suppliers, contract manufacturers, site personnel, and/or visitor activities.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.1 Training Requirements

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. This was evidenced in the facility by interviews with plant employees in production and maintenance. "Training , section 5.2-01" (dated 01/31/2022) outlined the training program.

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 product legality and safety shall be defined and documented (refer to 2.1.1.6).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2 Training Program

The facility has documented a training program, described in "Training, section 5.2-01" (dated 01/31/2022), which covers the necessary competencies for plant personnel. This program requires training to be conducted for new hires and refresher training to ensure regulatory, food safety, and all other requirements of the SQF System are met. This training program is administered by a QA department and HR.

Work instructions have been written explaining how tasks critical to maintaining food safety are performed. Records of work instruction training were reviewed for sanitation.

HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The team members had training on file.

The training language and materials are in Spanish & English, which is the language used in the operation and understood by all plant personnel.

Periodic refresher training needs have been identified in the Training program that noted which programs were required. The training program was in place for personnel hygiene, allergen, HACCP, food defense food fraud, and quality. Refresher training is completed on an annual basis.

A training skills register is maintained by the SQF Practitioner and includes a listing of the trainee, trainer, the description of the training, the date of training, and verification by supervision that the training was completed. The facility verifies the effectiveness of training by quizzes and visual observation for certain programs. Plant employees interviewed in quality, production, and maintenance were found to have current training records on the register.

2.9.2.1 A training program shall be documented and implemented that, at a minimum, outlines the necessary competencies for specific duties and the training methods to be applied for personnel carrying out tasks associated with:

- i. Developing and maintaining food safety plans to meet regulatory requirements and the SQF Code;
- ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
- iii. Personal hygiene for all staff involved in handling of food products and food contact surfaces;
- iv. Good Storage and Distribution Practices and work instructions for all staff engaged in food handling, food storage and transport, and associated equipment;
- v. Allergen management, food defense, and food fraud for all relevant staff; and
- vi. Tasks identified as critical to meeting effective implementation and maintenance of the SQF Code.

The training program shall include provision for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.3 Training records shall be maintained and include:

- i. Participant name;
- ii. Skills description;
- iii. Description of the training provided;
- iv. Date training completed;
- v. Trainer or training provider; and
- vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.1 Premises Location and Approval

The sites buildings, property and surroundings were observed during the audit to not pose a risk to food safety. There was an on-going risk assessment for the local activities. If there were any changes to local activities, it was recorded on this log. The facility maintains the required approvals by relevant authorities, as evidenced by FDA registration, current State Food Processing License, for their ongoing operations.

12.1.1.1 The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities.

The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2 Building Materials

Floors are constructed of smooth and dense impact-resistant material and properly graded for effective drainage of overflow or wastewater. Wastewater during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. The walls, ceilings, and doors are of durable construction with smooth and light-colored surfaces. These areas were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Overhead cleaning was found to be part of the master cleaning schedule. Doors, windows, and frames were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of wood. Drop ceilings were not used.

12.1.2.1 Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.2 Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.3 Waste trap system shall be located away from any food handling or storage area or entrance to the premises.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.4 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 12.2.5).

Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.5 Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.6 Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.7 In warehouses where food products are recouped or exposed, the product contact surfaces shall be constructed of materials that will not contribute a food safety risk

RESPONSE: COMPLIANT

EVIDENCE:

12.1.3 Lightings and Light Fittings

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof in product areas. There were not any light intensity regulations and the lighting was adequate for the industry.

12.1.3.1 Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.3.2 Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.4 Dust, Insect, and Pest Proofing

Windows, doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. Personnel access doors are self-closing and sealed to prevent any pest infestation. External doors and dock doors were sealed to prevent infestation. Electric insect devices, interior and exterior rodent stations are located so product is not at risk for contamination. Bait was not used on site.

12.1.4.1 All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, insects, birds, and other pests.

External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, birds, and other pests.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.4.2 Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.5 Ventilation

The oven was used in well-ventilated areas with fume extraction devices which were included in the master cleaning schedule. Condensation was not seen. Adequate ventilation was observed throughout. Positive air pressure was not required.

12.1.5.1 Adequate ventilation shall be provided in enclosed storage and food handling areas.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.5.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6 Equipment and Utensils

Plant has the specifications for equipment, utensils and protective clothing written in the Manual of GMP. All equipment and utensils are designed, constructed, installed, operated and maintained to meet regulatory requirements and they not to pose a contamination threat to products. Equipment is made of stainless steel and approved materials for food contact and non-food contact. Equipment is installed in such a way it is easy cleanable. Protective clothing used in plant does not contribute to contamination of materials and products. Equipment, utensils and protective clothing are cleaned after use to control contamination, and stored in a clean and serviceable condition to prevent microbiological contamination.

12.1.6.1 Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.2 Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and not pose a contamination threat to products.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.3 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.4 All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.5 Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.6 In addition to the above, locations handling exposed products and recouping products on-site shall have:
i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5;
ii. Clearly identified equipment and utensils that are used for inedible material; and
iii. Clearly identified waste and overflow handling equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.7 Grounds and Roadways

The grounds and surrounding areas were observed to be free of dust and waste so pests are not attracted. The outside grounds were included in the annual internal inspections. Vegetation was controlled so as not to attract pests and vermin. Paths, roadways and dock areas were well maintained. Pathways from amenities (smoking area and outside eating area) were sealed. Standing water was not seen.

12.1.7.1 The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste or accumulated debris so as not to attract pests and vermin.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.7.2 Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.7.3 Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1 Repairs and Maintenance

There is a procedure for temporary repairs "Facility & equipment maintenance, 5.6" recorded: it includes using food-grade materials. The maintenance system requires a task list, at the end of the task it is verified. At the beginning and end of every shift, there is another global verification. In this record evidence is available: forklift and dock doors must be acct after job done, ensure tools accounted after repair done. There are 2 cabinets to keep food-grade lubricants and allergen-free. The preventative maintenance program includes forklifts. For each area, there is a maintenance plan: mechanical and electrical. There are work orders, the department is working, there is a new system and some pending information to upload to the system / for improvement projects there are outsourcing maintenance suppliers.

12.2.1.1 The methods and responsibility for the maintenance and repair of facility, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.2 The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety. Routine maintenance of plant and equipment in any food handling or storage area shall be performed according to a maintenance control schedule and recorded.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.3 Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.4 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.5 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.6 Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.7 Equipment located over exposed product shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.8 Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2 Maintenance Staff and Contractors

Maintenance personnel are required to be trained in good manufacturing practices and food safety. Training records were on file for maintenance contractors. Escort was required for all contractors. When repairs are completed, personnel are required to document the accounting of tools and cleanliness of the work areas which is then followed by an inspection and release. This documentation found on file in completed work orders that included certified start-up which included cleaning and inspection. There had not been any non-routine repairs in the last year on food contact surfaces.

12.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2.2 All maintenance staff and 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. Records of training shall be documented and retrievable.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2.3 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 that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.3 Calibration

There are no equipment does needs to be calibrate to ensure food safety

12.2.4 Pest Prevention

A policy defines the facility's program for integrated pest management in "Pest prevention" (dated 01-08-2023). No pest activity was identified or noted during tours, that presented a risk for product contamination and corrective action and record-keeping procedures are in place should this occur dated 2022-01-21, annual risk assessment was carried out on 2023-04-17. This included handling any pest infestation in packaging, raw materials, or finished products including requirements for records of any incidents. Live animals were not found inside the facility during the audit. An updated scope of service dated 2022-01-24 defines the methods of pest control, frequency of interior and exterior inspections, and targeted pests. A current site map, dated 2023-04-23 is accurate in showing the location of external and internal devices. A pesticide application log gives details of the chemical usage which had not occurred in the past year. The technician provided reports of the service completed. Licenses of the Pest Control Operator from local authorities are current and indicate employees are trained and competent, licenses expire on 2024-12-31, Liability insurances expires 2023-10-01. A list of chemicals used by the Pest Control Operator is found in the approved pesticide list and includes SDS information. The pest control operator removes empty chemical containers from the site however no pesticides had been used in the past year. Pesticides were not stored on site. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues highlighted by the Pest Control Operator are addressed and documented by the facility. Trending was found in the pest control program and completed quarterly.

12.2.4.1

A documented pest prevention program shall be effectively implemented. It shall:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.4.2** Pest contractors and/or internal pest controllers shall:
- i. Be licensed and approved by the local relevant authority;
 - ii. Use only trained and qualified operators who comply with regulatory requirements;
 - iii. Use only approved chemicals;
 - iv. Provide a pest prevention plan (refer to 12.2.4.1), which includes a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices;
 - v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments;
 - vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and
 - vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.4.3** Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging.

Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.4.5** Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.4.6** No animals shall be permitted on-site in food handling or storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.5 Cleaning and Sanitation

The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan for 2023 showed tasks were completed as scheduled. Methods for recorded and scheduled verification of the effectiveness of cleaning are documented. Cleaning verification completed in the Weekly Operational Inspection Form for May and June were reviewed and found to be satisfactory. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Cleaning chemicals for the floor cleaner and bathrooms were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted 2023-03-24.

- 12.2.5.1** The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities shall be documented and implemented. Consideration shall be given to:
- i. What is to be cleaned;
 - ii. How it is to be cleaned;
 - iii. When it is to be cleaned;
 - iv. Who is responsible for cleaning;
 - v. Validation of cleaning procedures;
 - vi. Methods used to confirm the correct concentrations of detergents and sanitizers, and
 - vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.2** Detergents and sanitizers shall be suitable for use in a food and storage and handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure:
- i. The site maintains a list of chemicals approved for use;
 - ii. An inventory of all chemicals purchased and used is maintained;
 - iii. Detergents and sanitizers are stored as outlined in element 12.6.4;
 - iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
 - v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.3** Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.4** Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.5.5 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, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.2.5.7 Records of cleaning and sanitation activities, verification, and inspections shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1 Personnel Welfare

A Good Manufacturing Practice policy for all employees has been documented and implemented in “GMPs, section 5.1” (dated 06/14/2022). Employees are prohibited from working in food handling areas when suffering from infectious and communicable diseases or have been exposed to cuts, sores, or lesions. The policy requires that minor cuts or abrasions be covered with a waterproof, metal detectable, and colored bandage. The bloodborne pathogens program addresses the cleaning of a bodily fluid spill. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements.

12.3.1.1 Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means.

In the event of an injury that causes spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and storage areas, have been adequately cleaned and that all materials and products have been quarantined and/or disposed of.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products, recoup, or repack processes.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.2 Handwashing

Hand wash sinks were seen to be available at accessible locations for employees. Sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser and waste containers are available. Signs are posted reminding employees to wash their hands and employees who wear gloves are also required to follow the hand wash procedures. Interviews conducted with Forklift Driver and Warehouse Support person during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit.

12.3.2.1 All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors:

- i. On entering food handling, storage, and processing areas;
- ii. After each visit to a toilet;
- iii. After using a handkerchief;
- iv. After smoking, eating, or drinking; and
- v. After sneezing or coughing.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.2.2 Handwash stations shall be available and accessible as required.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.2.3 Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with:

- i. A potable water supply at an appropriate temperature;
- ii. Liquid soap;
- iii. Paper towels; and
- iv. A means of containing used paper towels.

An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.2.4 Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3 Clothing and Personal Effects

A policy, based on a documented risk assessment, found in "GMPs, section 5.1" (dated 06/14/2022) defines the sites's clothing requirements and has been implemented. Clothing including shoes are required to be clean at the commencement of the shift.

Employees were observed to comply with the clothing requirements of the facility. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management.

12.3.3.1 Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so as not to present a contamination risk to products.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3.2 Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3.4 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does not pose a food safety risk.

All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4 Visitors

A policy defining visitor and contractor requirements has been documented in Contractor & Visitor Policy and implemented. The policy requires that visitors and contractors follow GDPs defined by the sites, enter and exit through proper access points, follow hand wash requirements as applicable, wear suitable clothing and footwear and have an absence of visible signs of illness. A policy to manage driver access and designated driver area was in place and was complied with during sites tours.

12.3.4.1 All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.2 All visitors, including management staff, shall wear suitable clothing and footwear when entering any food storage and handling area.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.4 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.5 All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all times in food handling and storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.6 The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5 Staff Amenities (change rooms, toilets, break rooms)

A documented Weekly Master Sanitation Schedule describes the processes, chemicals and frequency of cleaning the personnel and ancillary areas of the facility. Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. Provisions have been made for storage of street clothing and personal items and are separate from storage areas.

Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with the SQF Practitioner, combined with onsites observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Designated cleaning tools for the restrooms are in place.

Lunch rooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunch rooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. Outside eating areas are properly maintained to prevent contamination and pest risks. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunch rooms. Lunch rooms were observed to be clean and well-maintained during the audit tours.

12.3.5.1 Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.2 Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.3 Toilet rooms shall be:
i. Designed and constructed so that they are accessible to staff and separate from any food handling operations;
ii. Accessed from the warehouse or food handling area via an airlock vented to the exterior or through an adjoining room;
iii. Sufficient in number for the maximum number of staff;
iv. Constructed so that they can be easily cleaned and maintained; and
v. Kept clean and tidy.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.4 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. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.5 Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.6 Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5.8 Signage in languages understood by staff advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in break rooms and break room exits.

RESPONSE: COMPLIANT

EVIDENCE:

12.4.1 Personnel Processing Practices

The plant does not open product on sites. Operators observed in the warehouse were following personnel processing practices defined in the Good Distribution Practices Policy.

12.4.1.1 All personnel shall comply with the following practices:

- i. Personnel entry to food handling areas shall be through the personnel access doors only;
- ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer;
- iii. The wearing of false fingernails or fingernail polish is not permitted when handling exposed food;
- iv. Materials and products shall be kept in appropriate containers as required and off the floor;
- v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate;
- vi. Staff shall not eat or taste any product in the food storage or handling area;
- vii. Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and
- viii. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only.

Code Amendment #1

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

RESPONSE: COMPLIANT

EVIDENCE:

12.4.1.2 All personnel engaged in storage, transport, and handling of packaged products and materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1 Water Supply

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from the Grand Praired with a current water report on file for 2022. It was determined that there was adequate hot and cold water for cleaning and processing. Non-potable water systems fire suppression-sprinkler were properly designed and were observed to be separated from the potable source. There is no backflow system on site

12.5.1.1 Adequate supplies of water drawn from a known clean source shall be provided for use during holding, storage and cleaning of the premises and equipment.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1.2 Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1.3 Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1.5 The use of non-potable water shall be controlled such that:

- i. There is no cross-contamination between potable and non-potable water lines;
- ii. Non-potable water piping and outlets are clearly identified; and
- iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.2 Water and Ice Quality

Water is not required to be treated or tested at the facility as it is not used in processing. N/A

12.5.3 Air and Other Gases

Food contact compressed air is not used at the sites. N/A

12.6.1 Receipt, Storage and Handling of Goods

“Product Storage & warehousing, section 5.10” (dated 06/13/2022) outlined the storage requirements for raw materials, work in process, and finished products. This same policy outlined stock rotation which was based on FIFO. Storage rooms for raw materials, finished goods, containers, and equipment were observed to be well designed and constructed. Temporary or alternative storage was not used.

12.6.1.1 The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging, equipment, and chemicals.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.2 Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.3 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.4 Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.5 Where goods 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 is no risk to the integrity of those goods, or contamination, or adverse effects on food safety.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.2 Cold Storage, Freezing and Chilling of Foods

No Cold Storage, Freezing and Chilling of Foods on site

12.6.3 Storage of Dry Goods

Storage areas for raw materials, packaging and finished goods were observed to be located away from any wet areas, clean and well maintained. The product is protected from contamination, deterioration, and pest harborage. Racking is designed and constructed from impervious materials and located so storage areas can be cleaned and inspected. Frequency of cleaning of racks is described in the Master Sanitation schedule and all areas of the food warehouse were observed to be clean.

12.6.3.1 Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.4 Storage of Hazardous Chemicals and Toxic Substances Used On-site

Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. No processing utensils or packaging were stored next to chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility, and are used according to the label. SDS and the label declaration for the chemical's intended use were reviewed and found in the SDS binder. Containers that are empty are rinsed and stored in the dumpster to prevent reuse. Chemical training was carried out on 2023-03-24.

- 12.6.4.1** Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be:
- i. Used only according to manufacturers' instructions;
 - ii. Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces;
 - iii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site;
 - iv. Supplemented with a current Safety Data Sheet (SDS) made available to all staff;
 - v. Controlled to track usage and ensure return to the appropriate storage areas after use;
 - vi. Be compliant with national and local legislation; and
 - vii. Used so that there is no cross-contamination between chemicals.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.4.2** Hazardous chemicals and toxic substances shall be stored:
- i. In an area with appropriate signage;
 - ii. Accessible only by personnel trained in the storage and use of chemicals;
 - iii. Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment;
 - iv. In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and
 - v. Stored so that there is no cross-contamination between chemicals.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.4.4** The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that:
- i. Empty chemical containers are not reused;
 - ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and
 - iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.6.5 Loading, Transport, and Staging Practices

“Loading, Transport, and Unloading Practices” (dated 10/25/2021) defined the practices for loading and unloading food products. It was observed during the audit tours that food is unloaded, stored, and loaded under conditions that prevent cross-contamination.

The facility’s policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading. Documentation was reviewed for 2023-03-24. It was observed during the audit tours that loading practices do not expose products to detrimental conditions. Seals were placed on each outbound load and noted on the BOL. All shipping is ambient. Warehouse interviews revealed that employees are aware of the proper procedures and follow them. It was observed that unloading practices are designed to prevent product contamination. All receiving is ambient. Dry ingredients and packaging were observed to be stored separately from unprocessed raw materials.

- 12.6.5.1** The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.5.2** Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at the required environmental condition and temperature.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.5.3** Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.5.4 Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.1 High-Risk Processes

The plant does not conduct high risk processes.

12.7.1.1 The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

EVIDENCE: The plant does not conduct high risk processes.

12.7.2 Control of Foreign Matter Contamination

A policy, "Physical contaminant control" (dated 0/13/2022) defining the methods and responsibilities for preventing foreign material contamination has been documented and implemented. Weekly operational inspections and regularly scheduled maintenance inspections are conducted and documented for the condition of equipment and any potential contaminants. Glass is not permitted in food storage zones except for product in glass packaging. A glass register has been documented detailing glass, brittle plastic and ceramic sources in all areas of the plant. The glass register is current as of 2023-02-16. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted in July, 2022 was reviewed. Wooden pallets were clean, in good condition and subject to regular inspection. Periodic maintenance inspections include looking for loose objects and for potential contaminants from overheads.

12.7.2.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.2 Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not been detached or become damaged or deteriorated.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.3 Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers, or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.4 Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.5 Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.6 Regular inspections of storage and handling zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.7 Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.8 Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.7.3 Managing Foreign Matter Contamination Incidents

The sites's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection (including of cleaning equipment and footwear) occur if a glass breakage were to occur. A responsible person, SQFP, is required to inspect and clear the affected area before resumption of normal operations.

12.7.3.1 In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked, or disposed of.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.8.1 Waste Disposal

A policy, entitled "Waste Disposal, LA " (dated 10/25/2021) defining the methods and responsibilities for handling dry, wet, and liquid waste has been documented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins, and storage areas were observed to be well maintained and clean on the exterior of the facility. Solid waste from processing was observed to be properly disposed of. Animal feed is not generated. Wastewater is treated before discharged and is used to irrigate the fields. Trademarked materials were sent to a landfill with certificate of destruction according to the same policy.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.8.1.3 Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.

RESPONSE: COMPLIANT

EVIDENCE:

12.8.1.4 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

RESPONSE: COMPLIANT

EVIDENCE:

12.8.1.6 Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).

RESPONSE: COMPLIANT

EVIDENCE:

- 12.8.1.7** A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).

RESPONSE: COMPLIANT

EVIDENCE: