



SQF Food Safety Audit Edition 9

D&S Ingredient Transfer Company Inc.

Summary

AUDIT DECISION**CERTIFIED****CERTIFICATION NUMBER****71783 | 310002****AUDIT RATING****Excellent****DECISION DATE****02/29/24****AUDIT TYPE****RE-CERTIFICATION****RE-CERTIFICATION DATE****01/19/25****AUDIT DATES****02/01/24 - 02/02/24****EXPIRATION DATE****04/04/25****ISSUE DATE****02/29/24**

Facility & Scope

D&S Ingredient Transfer Company Inc.

5112 Alhambra Ave.,

Los Angeles, CA, United States, 90032

Food Sector Categories:

19. Food Ingredient Manufacturing

21. Oils, Fats, and the Manufacturing of Oil or Fat-based Spreads

Products:

Liquid Sugar, Medium Invert, Granulated

Sugar, Corn Sweetener, Edible Oil.

Scope of Certification:

Liquid Sugar Manufacture, Medium Invert

Manufacture, Granulated Sugar Transfer, Corn

Sweetener Transfer, Edible Oil Transfer.

Certification Body & Audit Team

CICS Americas Inc.

8350 Ashlane Way Suite 104,

The Woodlands, TX 77382

CB#: CB-1-CICS**Accreditation Body:** ANSI**Accreditation Number:** 1087**Lead Auditor:** Luis Palacios (124403)**Technical Reviewer:** Cesar Hernandez (120868)**Hours Spent on Site:** 16**Hours of ICT Activities:** 0**Hours Spent Writing Report:** 8

Non-Conforming

2.7.1 Food Defense Plan

This assessment reviewed the ability for the facility to retrieve camera footage from oa specified date and time. Clips from 16 cameras was provided within 30 minutres. Review of perimeter fencing: meets company standards. Comments: perimeter fencing was reviewed during internal audit 12/2023. Comments: potential entry sites included four vehicle entraces/exists; two gates on rail entrance and exit for vehicles. /NCm: During the tour of the plant, the auditor observed that the west entrance that is no longer used for the entry of train cars has an opening capable of allowing unauthorized persons to enter the plant.

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: MINOR

EVIDENCE: NCm: During the tour of the plant, the auditor observed that the west entrance that is no longer used for the entry of train cars has an opening capable of allowing unauthorized persons to enter the plant.

ROOT CAUSE: This area, while under constant surveillance via CCTV, was missed as a potential vulnerability during the facility and grounds assessment. The area would permit access to the facility grounds should someone squeeze through between the railroad tracks. The facility and leadership team initially viewed this as being low risk due to subsequent security; however, it is a vulnerability and needs to be addressed.

CORRECTIVE ACTION: The area between the tracks was backfilled with gravel and dirt to reduce the gap between the bottom of the security fence and the ground. Photos are attached.

VERIFICATION OF CLOSEOUT: Photos in attachment showed that the violation is already fixed.

COMPLETION DATE: 02/08/2024 **CLOSEOUT DATE:** 02/12/2024

Section Responses

Audit Statement

Audit

SQF Practitioner Name

Name the designated SQF Practitioner

RESPONSE: JESSE DIAZ, JEREMY ADAMSON

SQF Practitioner Email

Email of the designated SQF Practitioner

RESPONSE: JADAMSON@NATSUGAR.COM

Opening Meeting

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

RESPONSE: NOLAN LORD: SENIOR QUALITY ASSURANCE SPECIALIST, KELLY MALONE (ON-LINE): QUALITY MANAGER, JEREMY ADAMSON: QUALITY DIRECTOR, JESSE DIAZ: FACILITY MANAGER, LUIS PALACIOS: SQF AUDITOR.

Facility Description

Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

RESPONSE: THE FACILITY HAS THE CAPABILITIES TO RECEIVE SUGAR VIA BULK RAIL, BULK TRAILER, OR PACKAGED PRODUCTS TRANSPORTED BY DRY VAN TRAILER. THIS FACILITY DOES NOT POSSESSES WAREHOUSING CAPABILITIES AND ALL SUGAR RECEIVES IS UTILIZED FOR LIQUID SUGAR, MEDIUM INVEERT PRODUCTION, OR TRANSFER TO BULK TRAILER. BULK PRODUCT IS STORED IN A SINGLE SILO. THE D&S FACILITY ALSO OPERATES A FOOD-GRADE TRAILER WASHING STATION TO WASH TRAILERS. OTHER PRODUCTS RECEIVED AT THIS FACILITY ARE CORN SWEETENER PRODUCTS AND VEGETABLE OILS. PRODUCT: LIQUID SUGAR AND MEDIUM INVERT SUGAR. IMPORT CAPABILITY: THIS FACILITY CAN SOURCE BOTH DOMESTIC AND FOREING SUGAR FOR PROCESSING. INGREDIENTS/RAW MATERIALS: INGREDIENT: WAER (SOFTENED, PURIFIED, AND FILTERED); RAW MATERIAL: SODIUM HYDROXIDE, CAUSTIC (INVERT OF PH ADJUSTMENT PER CUSTOMER REQUEST), RAW MATERIAL: ACID, HYDROCHLORIC (INVERT ONLY). NUMBER OF EMPLOYEES: 10 (2 FULL TIME & TEMPORARY).

Closing Meeting

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

RESPONSE: NOLAN LORD: SENIOR QUALITY ASSURANCE SPECIALIST, KELLY MALONE (ON-LINE): QUALITY MANAGER, JEREMY ADAMSON: QUALITY DIRECTOR, JESSE DIAZ: FACILITY MANAGER, LUIS PALACIOS: SQF AUDITOR.

Auditor Recommendation

Auditor Recommendation

RESPONSE: PROCEED WITH THE RECERTIFICATION AFTER SOLVING THE MINOR VIOLATION FOUND DURING THE AUDIT.

2.1.1 Management Responsibility

There is a documented Food Safety and Quality Policy, related to NATIONAL SUGAR MARKETING, SMBSC, SPRECKELS, and AMALGAMATED SUGAR. This policy is signed by all the managers like the President & CEO, Director of Quality Assurance, and specially the site's manager: Jesse Diaz, Facility Manager. Rev 3, 2023-10-16. Interview with the site manager comments that the people who work on the site have given suggestions through the survey. There is an Amalgamated Sugar tool for providing a survey to the employees, which includes the food safety culture. This is a smaller company with only a few employees so the relationship is closer, 90% of the employees have been in the company for more than 10 years. The company runs 3 shifts and the organizational chart takes it over: there are daily leads and night leads, also swing lead, customer service, employees and sanitation. Facility Manager is the Primary Practitioner, and the back up is the Lead Customer Service. Evidence of the HACCP training of the Primary and Back-up Practitioners: International Food Safety & Quality Network, Practical HACCP Training Certificate. Date: Mar 2022, 15th. The same situation about Miss Maira Cortez, the Backup.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: This was a programmed audit.

2.1.2 Management Review

Ramdonly, the auditor required to see the monthly minutes of the management reviews: October 2023, 1 hour, General notes: SOPE Review: Complaint Procedure, Documentation, Index, Training: Safety Training Personal Protective Equipment; Food Safety & Quality Incident Reprints: INCIDENT No.: ADMRO101923, rAILCAR wrfx1596554 ARRIVED WITH A MISS APPLIED SECURITY SEAL ON THE MAIN VALVE. Another one was reviewed: December 2023. There is also evidence of the Annual Review, with the help of the Corporate Office, that designed an Excel Tool for this purpose. The auditor asked for the evidence of the review of the Food Safety Culture Performance, and the information is the following: Culture performance trending isn't setup in a meaningful way way. New metrics should be developed to provide accurate representation of FS culture.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3 Complaint Management

There is a Corporate procedure for the handling of complaints from customers. Methods and responsibility for handling customer complaints are documented in Corporate based manuals and procedures. No food safety complaints in this site in the last year 2023. Only one complaint in regard to quality. Procedure is the Corporate Procedure.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1 Food Safety Management

There is a document called National Sugar Marketing, Food Safety & Quality Assurance Manual, 2023 General Revision, there is a once a year meeting to review all the documents. QA Manual and form Revision Log, the dates differ in days, it is available in smart sheet and all the user have access to this. Contents: 1.0 Management Commitment, 2.0 Document Control, 3.0 Regulatory compliance, 4.0 Product Identification, 5.0 Food Safety: Good Manufacturing Practices & hazard analysis & risk based preventative controls, etc.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2 Document Control

The document owner drafts the document. The quality assurance manager reviews the document for accuracy and compliance with food safety and quality assurance requirements. The plant manager reviews the document for feasibility of implementation. The document owner, the quality assurance manager, and the plant manager approve the document. The document is communicated to all employees who need to know about it. The document is made available to all employees who need to access it. The document is used in accordance with its procedures. The document is reviewed on a regular basis. The document is updated as needed to reflect changes in food safety and quality assurance requirements. Documents are retained for a period of five years. Documents that are considered to be critical to the safety or quality of the food products may be retained for a longer period of time. Documents that are no longer required are destroyed in a secure manner.

- 2.2.2.1** The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3 Records

The methods, frequency, and responsibility for verifying, maintaining, and retaining records are documented and implemented. During the audit the auditor could review a sort of different records. Most of the times the printed matters were scanned and available on the electronic database.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1 Specification, Formulation, and Realization

There is not a product development area in the facility. No new products are developed. In case of new products, the FS team in in charge of validate, verify and update the HACCP Plan.

2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services)

Auditor took some samples in regard to the site's product specifications: OILS DIVISION, Product Data Sheet, Reviewed 2023. Product Description: 860700 Refined, Bleached and Deodorized Soybean Oil. Technical Data: / Nutritional Data. Product spec: Iodine Value 122.0 - 138.0; Saturates: 15.5%, Trans Fatty Acids: <1.5%. Ingredient Statement: Soybean Oil. Shelf life: shelf life of bulk oils is dependent on oil type, handling storage environment, and intended use requirements. Factors that influence quality are exposure to oxygen, light, pro-oxidizing metals, excessive temperatures, and moisture. ADM admits to validate quality over time based on storage conditions and intended use of the product. Another product spec: Product description: Refined, bleached and deodorized corn oil. For this: peroxide value (truck): 0.50 Mx. No additives. Typical analysis: Iron (0.20 ppm), Nickel (1.20 ppm), Copper (0.10 ppm). There are no packaging materials in this site. All that they deliver is delivered in tankers. Sample of a certificate of analysis from the supplier: ADM Oils: Sold to: ADM Processing - Edible oils c/o D&S Ingredient Transfer company. Product: RBD Soybean Oil. Ship Date: 11/27/2023. Lot/ADM Order number: 573101. Quantity shipped: 205210 lb. Analysis results: Filterable impurities: 9.0, % moisture: 0.01. Iodine Value: 130.800. The way they identify a product is by assigning the product code, for instance: REFINED OIL RAIL CAR UNLOADING DOCUMENT: Product code 520. Date car released: 1-2-24. There are several contract service providers such as CO chemicals, laboratory testing, uniforms, transportation, pest control.

2.3.2.1 The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.2 Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.3 All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.4 Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.5 Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.9 Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable:

- i. Microbiological, chemical, and physical limits;
- ii. Composition to meet label claims;
- iii. Labeling and packaging requirements; and
- iv. Storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Manufacturers

They do not use contract manufacturers.

2.3.4 Approved Supplier Program

Supplier evaluation: the auditor took a sample of a supplier, in this case ARCHER DANIELS MIDLAND COMPANY, this particular one is GFSI certified under the FSSC 22000 standard (version 5.1 November 2020). This certificate is applicable for the scope of: Manufacturing of High Fructose Corn Syrup, Corn Syrup, Crystalline Dextrose, Digestion Maltodextrin and Fenining of Corn Oil. Manufacturing of gin and beverage ethanol. Besides the requirement is the Kosher Certification, issued by the Orthodox Union, December 11, 2023.

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

Code Amendment #2

Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

RESPONSE: COMPLIANT

EVIDENCE: In regard to emergency suppliers, this site a one of the many factories of the group, along the USA. When there is a situation with a particular site, including a supplier, they can take actions from other sites or at the Corporate Office Level. The auditor could see that there are main and backup suppliers available.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: The Quality Director commented that they do not conduct supplier audits, instead of this they collect all the information such as Food Safety Certificates. Only in the case of a problem with a supplier they commission an audit to this particular supplier.

2.4.1 Food Legislation

Within the Food Safety manual there is a chapter 3.1. FDA Registration & Regulatory Compliance. The company ensure that all facilities utilized to process, pack, or hold our sugar products meet state and federal food regulations. As such, operating facilities will meet FDA registration requirements, which includes initial registration. This requirement extends to company-operated and contracted facilities. It is established that the SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Good Production Practices

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Safety Plan

The auditor reviewed the D&S Ingredient Transfer Station: Liquid Sugar / Medium Invert Sugar. The plant contents: Facility and Food Safety Information, Product description: liquid sucrose and medium invert, Flow diagram, Supply-chain program, Amendments 6 Training, and Corporate Recall Plan. Plan Approval: By the General Manager: date 12/06/2023. General product description: Liquid Sugar (Sucrose). Intended use: this product is used as an ingredient in many food products and functions as a sweetener, Intended Consumer: Liquid sugar is distributed to food processors that provide products to the general public, including high risk groups. Shelf life: 30 days (with proper storage conditions). FDA Classification: GRAS 21 CFR 184.1854. Microbiological: Will not support the growth of vegetative pathogens. Meets ISBT and NFP standards for use in carbonated beverages and canned foods. The site performed the risk analysis and found no CCP, but they had some preventive controls: Process Control: None (foreign materials is of a size considered nonhazardous); allergen control: none, sanitation control: none, Supply-chain control: approved supplier for sugar ingredient and third party audit report. There are four HACCP plans: 1) Liquid Sugar, 2) Oil Products, 3) Corn Sweeteners, 4) Bulk Sugar. Only one of these is a manufacturing process (liquid sugar).

2.4.3.1 A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.2** The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.4** Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.5** The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.6** The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.12 The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.13 The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4 Product Sampling, Inspection, and Analysis

D&S Ingredient Transfer Facility, Sampling Liquid Sweetener. This work instruction provides detailed instruction on sampling liquid sweetener railcars, trailers, and storage tanks. Procedures: These are mandatory requirements where failure, in any way, will compromise the product integrity and operations standards. Samples must be properly handled, checked, and meet product specification. Analytical pH: Scope: this procedure governs the requirements for using a bench top pH meter. Critical requirements: pH meters shall be calibrated daily prior to use with freshh buffer or standards. Buffer standards have expiration dates. Expiration dates shall be clearly visible on standard bottles. The fact is that this site has a small laboratory for quality parameters, without the scope of the Food Safety System.

2.4.5 Non-conforming Materials and Product

Food Safety & Quality Assurance Manual, Nonconforming Product & Materials. The Company has established methods for identifying and handling nonconforming products or materials. Nonconforming products: Include products that are not suitable for direct sale without further processing or reclassification. These products are considered downgraded products but should not be allowed to be further contaminated with the intent of removal.

2.4.5.1 The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.6 Product Rework

Food Safety & Quality Assurance Manual. 7.2. Non conforming Product & Materials. 7.2.1. Purpose: the purpose of this policy is to outline the methods and responsibilities for handling nonconforming product or materials. 7.2.2. Policy: The Company has established methods for identifying and handling nonconforming product and materials to prevent inadvertent use or distribution. 7.2.2.1. Nonconforming product: include products that are not suitable for direct sale without further processing or reclassification. These products are considered downgraded products but should not be allowed to be further contaminated with the intent of removal. Reconditioned Sugar: This classification includes granulated sugar that may contain foreign material which may effectively be removed by liquification and filtration. Brown and powdered sugar are not classified as reconditioned. This resource change requires quality assurance submission and written approval from corporate quality. Product thus designated must include the reason for classification entered into the order comments.

2.4.6.1 The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure:

- i. Reworking operations are overseen by qualified personnel;
- ii. Reworked product is clearly identified and traceable;
- iii. Reworked product is processed in accordance with the site's food safety plan;
- iv. Each batch of reworked product is inspected or analyzed as required before release;
- v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1;
- vi. Release of reworked product conforms to element 2.4.7; and
- vii. Reworked product does not affect the safety or integrity of the finished product.

Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7 Product Release

Positive Release: Facilities consider all packed or loaded production to be on quality hold until appropriate monitoring and analyses occur. Appropriate monitoring includes commencement and documentation of quality testing per Policy 6.2 Product Sampling and Retain Requirements and HACCP monitoring per Policy 5.21 Food Safety Plan.

2.4.7.1 The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.

Records of all product releases shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7.2 Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7.3 In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.8 Environmental Monitoring

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

2.5.1 Validation and Effectiveness (Mandatory)

This site does not pack into bags or other packages, just bulk containers. For validation they have the Liquid Loadout Filters: the purpose of this document is to define operation, maintenance, and filter change frequency. Frequency: filter socks will be replaced at minimum every 2 weeks unless defects or loading requires more frequent change out. To be sure the filter socks are being replace accordingly they have a QR code, and they have a control which was observed by the auditor, the system sends a message when the pressure gage is out of the limit, is kind of an allert.

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

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

Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2 Verification Activities (Mandatory)

The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products are documented and implemented. Monitoring activity: Supervisory personnel verify the monitoring activity through record review within 7 days of record generation. The review is indicated by a signature and date. Food Safety Plans: the food safety plan is incorporated into annual internal audits.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.5.3 Corrective and Preventative Action

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4 Internal Audits and Inspections

2023 Internal Audit Report: D&S. Audit Performance metrics: Audit score: 95%. Percentage Complete: 100%. SQF Reference: 9th Ed. Area Needs Improvement: 11. Partially compliant: 19. Fully Compliant: 218. Exemplary 2. Not scored: 34. Not applicable: 127. No. of Questions: 411. Audit Participants: Three internal auditors were involved in this latest audit. The evidence of the training of one of the internal auditors was required by the auditor: M. B. has satisfactorily fulfilled the requirements established by the ASQE for professional attainment of the CERTIFIED FOOD SAFETY AND QUALITY AUDITOR. Date Issue: November 30, 2023. This audit was conducted in the period of 12/11/2023 - 12/12/2023. Besides the internal audit report, there are also monthly reports of the GMPs inspections. Auditor reviewed some of the reports, including November, February 27, and others. Very few findings and all of them were solved.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1 Product Identification and Traceability

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

2.6.1.1 The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure:

- i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and
- ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1.2 Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person.

Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved.

Product changeover and label reconciliation records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.2 Product Trace

4.4. Traceability. 4.4.1. Purpose: the purpose of this policy is to define the standards for facilities to maintain traceability programs and to outline traceability requirements for finished product, ingredients, and packaging materials. 4.4.2. Policy: Facilities perform trace exercises for finished products and raw materials (ingredients and packaging materials). Trace exercises evaluate a given facility's ability to identify product produced. Product trace exercise: 36/43 Corn Syrup, Container/lot #: vtgx190076, Ship date: 08-09-2023. Weight / quantity: 220250.00 Product analysis: dry solids: 80.2, pH 4.80, Dextrose equivalent: 36.7, Baume: 42.9. All of the parameters were within the limits. Product trace: Audit # 111655, Auditor: Jesus Diaz, Date of audit: 01/19/2024, Audit Subject: VTGX190076 36CS, Secondary Subject: ADMCP, Department: Warehouse. Time started trace exercise: 8.30 am.

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

- i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier;
- ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.);
- iii. Traceability is maintained where product is reworked (refer to 2.4.6); and
- iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2).

Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3 Product Withdrawal and Recall (Mandatory)

3.2. Recall Program & Testing: 3.2.1. Purpose: the purpose of this policy is to define the requirements for developing recall procedures, conducting recalls, and performing recall testing exercises. 3.2.2. Policy: National Sugar Marketing and Partner jointly generate and maintain a documented recall program that complies with current regulations. The program assigns responsibility and ensures that, if necessary, mechanisms are in place to effectively remove products from commerce promptly to protect customers and reduced the cost impacts of a recall. The plan is tested each calendar year against standards for success, and NSM or facilities implement corrective actions when testing reveals opportunities for improvement. Mock recall report: Railcar: ADMX 17560, Product: HFCS 42 (ADM#010042). Date loaded: 07/03/23. Date shipped / Location: 07/05/23 ADM-Clinton, IA. ADM Order #: 102911. Net Railcar Ship Weight: 191,750 lb. 07/20/23 Start Reading Tank 1: 1,570,474 lb. Note: Product is unloaded into 2,500,000 lb stainless steel storage tanks. This recall was completed in 2 hours 24 minutes and was well below 0.5% of the total weight.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: It is documented at the Corporate basis that the Quality / Recall team generates and submits a documented recall notification to the FDA, all consignees, and applicable certification bodies within 24 hours of a recall / withdrawal determination.

2.6.4 Crisis Management Planning

Crisis Management Plan Test: Facility Manager Jesse Diaz, Sr. Customer Service Rep. Maira Cortex and other representatives participated in the exercise. Date fo test: 10/17/23. Description of Crisis: Tuck wash caught on fire during the night, the building was a total loss. Wash building is separate from main building is separate from main building and product operations can continue since no product or systems were damaged that would impact production. Expected downtime: 8 months to return to full capacity and 16 hours to return to normal operation using external wash service. Describe immediate response: Ambulance, fire, police 911, ensure all employees are accounted for and moved to a safe location. Director of warehouse Chris Map phone call to inform. Product on hold: none, Product type: none.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1 Food Defense Plan

This assessment reviewed the ability for the facility to retrieve camera footage from oa specified date and time. Clips from 16 cameras was provided within 30 minutres. Review of perimeter fencing: meets company standards. Comments: perimeter fencing was reviewed during internal audit 12/2023. Comments: potential entry sites included four vehicle entrances/exists; two gates on rail entrance and exit for vehicles. /NCm: During the tour of the plant, the auditor observed that the west entrance that is no longer used for the entry of train cars has an opening capable of allowing unauthorized persons to enter the plant.

- 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: MINOR

EVIDENCE: NCm: During the tour of the plant, the auditor observed that the west entrance that is no longer used for the entry of train cars has an opening capable of allowing unauthorized persons to enter the plant.

ROOT CAUSE: This area, while under constant surveillance via CCTV, was missed as a potential vulnerability during the facility and grounds assessment. The area would permit access to the facility grounds should someone squeeze through between the railroad tracks. The facility and leadership team initially viewed this as being low risk due to subsequent security; however, it is a vulnerability and needs to be addressed.

CORRECTIVE ACTION: The area between the tracks was backfilled with gravel and dirt to reduce the gap between the bottom of the security fence and the ground. Photos are attached.

VERIFICATION OF CLOSEOUT: Photos in attachment showed that the violation is already fixed.

COMPLETION DATE: 02/08/2024 **CLOSEOUT DATE:** 02/12/2024

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2 Food Fraud

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1 Allergen Management

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: There are no allergenic materials in the site.

2.9.1 Training Requirements

The site determines the training requirements based on a Corporate policy: 5.2. Employee Food Safety & Quality Training. 5.2.1. Purpose. The purpose of this policy is to communicate the requirements for assessing and implementing a training program with an emphasis on food safety and quality assurance. Training is required by food regulation and the system requirements. Minimum curriculum: Food Safety Policy Statement, Basic cGMP/housekeeping and FDA awareness, Food Defense and intentional contamination; HACCP awareness. There is an internal system that provided the information of the employees that have attended the particular training.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2 Training Program

There is a documented training program and the auditor could review this and confirm that the staff is included and the situation of each of the employees. Samples were taken: Juan Henríquez. Storm Water Pollution Prevention Annual Training, 2023-08-24. General Safety Procedures: Annual Refresher Training, 2023-08-24, Truck Washing Training, 2023-08-24. Food Safety Culture. FSPCA training certificate for Juan Henríquez, "Food Defense Awareness". Completed: 12/21/2023.

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

- i. Implementing HACCP for staff involved in developing and maintaining food safety plans;
- ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
- iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces;
- iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment;
- v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products;
- vi. Environmental monitoring for relevant staff;
- vii. Allergen management, food defense, and food fraud for all relevant staff; and
- viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.3 Training records shall be maintained and include:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.1 Premises Location and Approval

The site is located in the city of Los Angeles, no neighbors nearby, no source of possible contamination is considering affecting the product. There is an empty warehouse across the street and residential homes. Auditor reviewed all the licenses and permits: FDA Certificate of Registration, No. 12857289624. State of California, Department of Public Health Food and Drug Branch, Processed Food Registration, Registration Number: 9916, Expiration Date: 9/29/2024.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2 Building Materials

The Los Angeles terminal has adequate infrastructure. It is a site that has a single entrance for tanker vehicles as well as a single entrance for train cars. And in the same way a single exit for both cases. There are silos for the storage of materials and a process area. The auditor observed everything accordingly during the tour.

- 11.1.2.1** Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions.
Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.2** Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.3** Waste trap system shall be located away from any food handling areas or entrances to the premises.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.4** Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.5** Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.6** Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.7** Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.8** Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.9** Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3 Lightings and Light Fittings

The lighting level is adequate. Many of the activities are carried out in outdoor areas, always within the perimeter of the plant, such as the unloading of materials coming from the train. The auditor was able to review the recordings that the manager has for the night shift work and was able to show that it is sufficiently illuminated.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.4 Inspection/ Quality Control Area

There is an on-site laboratory performing quality testing, this is well located, not posing a risk to the product safety.

11.1.4.1 If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall:

- i. Have easy access to handwashing facilities;
- ii. Have appropriate waste handling and removal; and
- iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.5 Dust, Insect, and Pest Proofing

All external windows, ventilation openings, doors, and other openings are effectively sealed when closed, and protected against dust, vermin, and other pests. External doors are designed and maintained to prevent pest ingress.

11.1.5.1 All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests.
External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.5.2** External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods:
- i. A self-closing device;
 - ii. An effective air curtain;
 - iii. A pest-proof screen;
 - iv. A pest-proof annex; and
 - v. Adequate sealing around trucks in docking areas.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.5.3** Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

RESPONSE: COMPLIANT

EVIDENCE: There are no electric insect control devices, or pheromone. Only some crawling insect control traps and baits for the exterior sides.

11.1.6 Ventilation

Adequate ventilation is provided in enclosed processing areas, but the fact is that the majority of the plant is in open areas, they move the materials from the train cars into the tankers, the silos, and those operations are done in open spaces.

- 11.1.6.1** Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.6.2** All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.6.3** Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.6.4** Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7 Equipment and Utensils

All equipment and utensils were observed adequate to the nature of the product and process. All the equipment are kept in clean and serviceable condition to prevent any kind of contamination.

- 11.1.7.1** Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8 Grounds and Roadways

Paths and loading / unloading areas are well maintained so they do not present a hazard to the food safety operations of the premises.

11.1.8.1 A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8.2 Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8.3 Paths from amenities leading to site entrances shall be effectively sealed.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1 Repairs and Maintenance

Preventative Maintenance, this is a site's SOP. All food-grade approved terminals, wash bays, and warehouses are required to maintain a preventative maintenance program (PM). Each program is structured to incorporate the requirements as described in this procedure. This procedure establishes the requirements for the most common equipment used in terminal and wash bay facilities that has potential to meet food grade products. All equipment used in food -grade service with potential for food contact must be included in the preventative maintenance program. All warehouse equipment designed as a final product equipment needs to be thoroughly cleaned and inspected prior to use. Food-grade transfer terminal employees, or approved and trained outside contractors, may be used to perform maintenance responsibilities. Mr. A.O. is the person in charge of the maintenance program, and he was interviewed by the auditor during the tour. There is evidence that he has attended the GMP training: Module 2: GMPs and Prerequisite programs, annual refresher training: 03/10/2023. Responsibilities: Mechanics/warehouse employees: any employees that enter product handling equipment follow GMP rules. When repairs are required, employees are responsible for repairing equipment without negatively affecting food safety, responsible for reporting potential threats to product safety to management, and responsible for completing post-maintenance tool/part verification documents. Lead man/supervisor: the warehouse lead man/supervisor is responsible for conducting a final inspection to ensure that machinery is cleaning and ready to be placed back into service. Preventative Maintenance Program: Each sweetener transfer terminal or wash station develops a preventative maintenance program. The auditor reviewed the monthly PM: this report includes The date service performed is available: there are weekly and monthly activities, for instance : Portable Oil Pump: Inspect Oil Level: Weekly; and Inspect Seals & Tighter if necessary: Monthly. There is evidence of the activities performed during the month. Auditor also reviewed the monthly report of November 2023.

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.2** Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.3** Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.4** Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.6 Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

EVIDENCE: Temporary repairs: Temporary repairs include repairs with materials such as wood, duct tape, cardboard, and string or twine. Temporary repairs are not permitted during normal operations. If a temporary repair is needed for emergency cases, the repair is documented, and facilities submit work orders to make the repairs permanent.

11.2.1.7 Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

EVIDENCE: No-Tox Food Grade Clear Grease 2 (Bel-Ray No-Tox Clear Grease # 2), Category Code: H1, NSF Registration No. 126353

11.2.1.8 Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.2 Maintenance Staff and Contractors

The site's manager commented that they use the compressor company and the boiler company for maintenance. There is evidence of the training in GMPs: Amalgamated Sugar: ATLAS COPCO confirms that on this day: 1/22/2024 The Los Angeles Customer Center service technicians listed below have reviewed and confirm compliance with the Good Manufacturing Practices set forth by Amalgamated Sugar.

11.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

RESPONSE: COMPLIANT

EVIDENCE:

11.2.2.2 All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

RESPONSE: COMPLIANT

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

11.2.2.3 Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3 Calibration

The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, are documented and implemented. Within the Quality Manual, 5.5. Certificates of calibration were reviewed: METTLER TOLEDO, Vehicle Scale Test Report, Device and Scale Details. Indicator: Mettler Toledo, Model IND780, Serial Number: b715958062. Platform: Mettler Toledo, Model: Truck Scale VTS100 Standard, Serial Number: C049632082. There is a directory of measuring, testing and inspection equipment that require calibration: DOC.015 - Calibration of Equipment List. this includes the following elements: Thermo Scientific, Anton Par Polarimeter, Reichert AR/ Serias, and some scales. The supplier of the calibration service was METTLER TOLEDO, and the certificates were provided to reviewing. This company is accredited ISO 17025 by the American Association for Laboratory Accreditation (A2LA) (<https://www.a2la.org/>)

11.2.3.1 The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3.2 Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3.3 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3.4 Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3.5 Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3.6 A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4 Pest Prevention

A documented pest prevention program is effectively implemented. SPRAGUE is the contractor for pest control. The auditor reviewed all the information at the company's portal. Trend Analysis report is available issued by SPRAGUE (www.spraguepest.com), that provides service to the whole Corporation. Business License: CALIFORNIA BUSINESS LICENSE, In California, the regulation of pest control businesses is a cooperative effort between two regulatory entities: the Structural Pest Control Board (SPCB), and the Department of Pesticide Regulation (DPR). Structural Pest Control Board, Original Certificate, Company Registration: Issue Date: July 11, 2017. By using the QR provided at the database they have the expiration date: December 31, 20235. There is a map locating all the traps along the facility: It includes: RBS: 17, and IRT: 10. They visit the site every week. The trend analysis includes the boiler room, downstairs office, locker room, mix room, sucrose lab, truck wash station. And the activity during year 2023 was totally zero. The auditor also reviewed the weekly reports: AMALGAMATED SUGAR - LOS ANGELES - 101900333, Weekly commercial general pest, Time in: Jan 30, 2024 12:56 pm, Jan 30, 2024, 1:26 pm. Service Technician: Walter Parada. Licenses: CA, FR 56116. This report is signed by M.C (the client) and W.P. (Service Technician). Pest summary: "No pest activity was noted during this service".

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5 Cleaning and Sanitation

5.7. Cleaning, Sanitation, & Waste management. The company and partener facilities operate in an hygienic manner by designing, implementing, and documenting cleaning and sanitation programs. These programs are based on product risk and include documented SOPs/WIs, MSS, and verification practices. This procedure defines the policies and programs that have been developed to comply with the Good Manufacturing Policies given in 21 CFR 110 as applies to sanitation and housekeeping for trailer wash stations, food-grade transfer terminals, and warehouse. Safety: approved chemicals and cleaning agents can be utilized for sanitation activities. Operator must be aware of hazards, wear appropriate PPE, and be familiar with MSDS's. Procedures: Sanitary Operations: This section describes the genreal policies and practices for cleaning and sanitation of a warehouse, transfer terminal, and wash station. MASTER SANITATION SCHEDULE, 7/3/23. This schedule includes: Front Yard: Job description: Wash down yard with pressure washer; empty garbage cans, lean & replce lineeers; pick up trash & debris, wash dwon yard with pressure washer, etc. Sanitization of Bulk Liquid Storage System is the procedure used for the CIP system. Equipment used: Tnaker Truck of Food - Grade Vessel Filled with Filtered Potable Water at 190 oF. etc. Record reviewed: Mix Tank, CIP Date: 12/02/23, Tank Level in Pounds: 1,000, Brix: 66.6, Tank Contents: Beet, Saitization Cycle Start Time: 111.30 PM. Finished time: 12.00 AM. Performed by: L.G.

- 11.2.5.1** The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to:
- i. What is to be cleaned;
 - ii. How it is to be cleaned;
 - iii. When it is to be cleaned;
 - iv. Who is responsible for the cleaning;
 - v. Validation of the cleaning procedures for food contact surfaces (including CIP);
 - vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and
 - vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.5.2** Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure:
- i. The site maintains a list of chemicals approved for use;
 - ii. An inventory of all purchased and used chemicals is maintained;
 - iii. Detergents and sanitizers are stored as outlined in element 11.6.4;
 - iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
 - v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.5.4** Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.5.5** Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1 Personnel Welfare

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

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

Code Amendment #1

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

RESPONSE: COMPLIANT

EVIDENCE: It is explained in the NSM + QA + Manual 2022 + Website: "5.3.2.7. Employees requiring medical alert jewelry, necklace below the shift of bracelet, must communicate requirements to Human Resources for evaluation before accommodations can be made". Personal Health & Disease Control: The company restricts personnel suffering from communicable illness, infectious diseases, or who are carriers of infectious diseases from handling finished products or working in direct contact positions in GMP-designated areas. Facilities instruct personnel to report such conditions. The company grants supervisory personnel the authority to move employees with known signs of foodborne illness to non-GMP areas. Signs of foodborne illness are defined by the FDA.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2 Handwashing

During the tour of the plant, the auditor specifically reviewed three handwashing stations which had everything required according to the code requirements, and he was even able to observe the staff carrying out the handwashing protocol correctly.

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

- i. On entering food handling or processing areas;
- ii. After each visit to a toilet;
- iii. After using a handkerchief;
- iv. After smoking, eating, or drinking; and
- v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3 Clothing and Personal Effects

There is a code for clothing in the plant which includes EPP like the use of protective glasses, earplugs, hairnets, beard nets, hats, vests, steeltoe shoes, etc.

- 11.3.3.1** The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.3.2** Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.3.3** Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.3.4** Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.6 Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.
All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.7 Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.8 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk.
All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.4 Visitors

All visitors are escorted at all times in food processing, handling, and storage areas. Due to this fact the risk of any pose of product contamination is controlled. Besides, just for entering the facility the GMPs are required: use of proper personal protective clothing and equipment, and sign-up of GMPs declaration. The site uses a QR code that the visitor must use to responde a quick form to be allowed to enter the facility. The auditor observed the nature of the operations in this site and the performance of the visitors protocol and considered it adequate to the risk of the site.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.4.2 All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.4.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5 Staff Amenities (change rooms, toilet, break rooms)

The auditor was able to observe the staff areas such as the dining room, bathrooms, changing rooms and everything was in accordance with what was required by the standard.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.2 Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.4 Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.5 Where required, a sufficient number of showers shall be provided for use by staff.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.6 Toilet rooms shall be:

- i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations;
- ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;
- iii. Sufficient in number for the maximum number of staff;
- iv. Constructed so that they can be easily cleaned and maintained;
- v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and
- vi. Kept clean and tidy.

Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.7 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.8 Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.9 Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1 Staff Engaged in Food Handling and Processing Operations

The design of the site is in such a way that does not allow the cross contamination of the products

11.4.1.1 All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices:

- i. Personnel entry to processing areas shall be through the personnel access doors only;
- ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging;
- iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor;
- iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and
- v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1 Water Supply

The water source in this site is the City of Los Angeles, California.

- 11.5.1.1** Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: In case there is an event for water sourcing from the city, there are a couple other sites from the company that can supply Liquid Sugar to clients.

- 11.5.1.3** Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.5.1.4** The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE: Backflow Prevention Device Field Testing and Maintenance Report. May 2023 Test Month. Manufacturer: Wilkins, Model: 975XL, Size: 2, Serial Number: W 122258. Water pressure: 80. Initial test: passed.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2 Water Treatment

There is no water treatment in this facility

11.5.3 Water Quality

Michelson Laboratories, Inc. www.michelsonlab.com, Laboratory Certificate. Printed: 02/09/2023. Received: 1/28/2023. Water - Mix Room: Lead 0.196 ug/l, Copper 7.31 ug/l, Arsenic 1.57 0.034 ug/l. Dibromoacetic and similar chemicals: ND. There is another report for Microbiological testing: Sample description: Production filters; Product Description: Municipal Water; Date received: 10/25/2023. Test method: Coliform Count. Result: <1.1 MPN/100mL. This laboratory is accredited by the A2LA, Scope of Accreditation to ISO / IEC 17025:2017, MICHELSON LABORATORIES, INC. BIOLOGICAL. Valid to: May 31, 2025. Certificate Number: 2074.02.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.5.4 Ice Supply

The site does not use Ice.

11.5.5 Air and Other Gasses

No air or other gasses are used in direct touch with product.

11.6.1 Receipt, Storage and Handling of Goods

Incoming Product & Storage. This procedure governs the requirements for accepting, verifying, and unloading liquid and dry products from rail cars, trailers, and totes. Procedures: Car Placement: Terminal manager, or designee, determines the placement of the rail car by the railroad at a designated spot on the track. This person is responsible to confirm the shipping documents match the rail car placed by the railroad. A rail car unloading log shall be filled out for each rail car spotted. This document will be used for logging seal numbers, comments, and dates/times and who did what steps of the unloading process. Security: Any rail car containing a food-grade product not being immediately unloaded is resealed with tamper-evident seals. All reapplied seals are wither logged on an overnight seal log or individual rail car unload document. Under no circumstances a rail car is left un-sealed when operators are not on duty in the immediate area. Inspection and approval: The incoming car is inspected and confirmed that it has not been tampered. During the tour the auditor interviewed the operators and they were aware of the procedure and showed the documents and also the electronic system.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.2 Cold Storage, Freezing and Chilling of Foods

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

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

Storage of dry ingredients, packaging materials, and other aids of processing is adequate for the nature of the products being manufactured and the processes.

- 11.6.3.1** Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.3.2** Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.5 Loading, Transport, and Unloading Practices

Temperature: if rail car needs to be heated, follow work instructions to heat rail car. Any liquid sweetener car that has to be heated/steam overnight is completely sealed and equipped with a temperature control device or be under continuous attendance to overheating product. Seal numbers are recorded in an overnight seal log. Covers and screens: all partially or fully open rail car hatches. The auditor required to review the overnight seal log: Seal application: Date: 1/7/24. Seal # 1: 376552, Initials J.D. Bulk sugar transfer line # 1.

- 11.6.5.1** The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.3** Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.4** Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.7** On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.8** Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.1 High-Risk Processes
No high-risk processes in this site.

11.7.2 Thawing of Food
No thawing of food in this site.

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

11.7.3.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.
Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.2 Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation).
Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: Acrylic, Glass and Brittle Plastic Inventory. This includes the created date: 02/01/24. And all the elements that have been verified: LAB: REFRACTOMETER BROKE, LIGHT BULB, Sucrose-Stama Cells Broken, etc.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4 Detection of Foreign Objects

All the lines being used have a set of filters, bag filters. The oil also have an additional filter. The corn-syrup it has 8 bag filters because of the nature of the fluid. For the incoming water used for the liquid sugar, there are 5 filters for preventing any foreign objects. The filters are checked and replaced no less than 2 weeks (according to the policy). They are sure they have been changed by taking pictures of this activity.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.2 Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.7.4.3** Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1 Waste Disposal

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE: