



# SQF Food Safety Audit Edition 9

## National Sugar Marketing - Bensenville

### Summary

**AUDIT DECISION****CERTIFIED****CERTIFICATION NUMBER****83158 | 310037****AUDIT RATING****Excellent****DECISION DATE****03/07/24****AUDIT TYPE****RE-CERTIFICATION****RE-CERTIFICATION DATE****03/02/25****AUDIT DATES****02/16/24 - 02/16/24****EXPIRATION DATE****05/16/25****ISSUE DATE****03/07/24**

### Facility & Scope

**National Sugar Marketing - Bensenville**

100 Galleria Pkway, Ste 1400  
Atlanta Georgia 30339  
United States

**Food Sector Categories:**

26. Food Storage and Distribution

**Products:**

Sugar

**Scope of Certification:**

Sugar

### Certification Body & Audit Team

**CICS Americas Inc.**

8350 Ashlane Way Suite 104,  
The Woodlands, TX 77382

**CB#:** CB-1-CICS**Accreditation Body:** ANSI**Accreditation Number:** 1087**Lead Auditor:** Joseph Khanona (449963)**Technical Reviewer:** Luis Palacios (124403)**Hours Spent on Site:** 8**Hours of ICT Activites:** 0**Hours Spent Writing Report:** 8

## Section Responses

<b>Audit Statement</b>	<b>Audit</b>
<b>SQF Practitioner Name</b>	<p>Name the designated SQF Practitioner</p> <p><b>RESPONSE:</b> LEVI HOLMES</p>
<b>SQF Practitioner Email</b>	<p>Email of the designated SQF Practitioner</p> <p><b>RESPONSE:</b> LHOLMES@NATSUGAR.COM</p>
<b>Opening Meeting</b>	<p>People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p><b>RESPONSE:</b> LEVI HOLMES, WAREHOUSE MANAGER (SQF PRACTITIONER); JEREMY ADAMSON, DIRECTOR OF QUALITY ASSURANCES; MIA BURNS, QUALITY ASSURANCES SPECIALIST; NOLAN LORD, SENIOR QUALITY ASSURANCES SPECIALIST, LEAD AUDITOR.</p>
<b>Facility Description</b>	<p>Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)</p> <p><b>RESPONSE:</b> THE BENSENVILLE FACILITY IS A STORAGE WAREHOUSING OPERATION. THIS FACILITY CAN RECEIVE DRY VAN TRAILER AND BOXCAR SHIPMENTS. AFTER STORAGE, THIS FACILITY SHIPS THE PRODUCT VIA A DRY VAN TRAILER. BOXCAR SHIPMENTS ARE UTILIZED TO TRANSPORT REMELT SUGAR BACK TO THE BEET REFINERIES FOR REPROCESSING. THE FACILITY IS 103,554 FT2 AND OPERATES 5 DAYS A WEEK FROM 6:30 AM TO 3:00 PM WITH 8 FULL-TIME EMPLOYEES AND THE USE OF TEMPORARY LABOR WHEN NEEDED. THE FACILITY WAS CONSTRUCTED IN 1970.</p>
<b>Closing Meeting</b>	<p>People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p><b>RESPONSE:</b> LEVI HOLMES, WAREHOUSE MANAGER (SQF PRACTITIONER); JEREMY ADAMSON, DIRECTOR OF QUALITY ASSURANCES; MIA BURNS, QUALITY ASSURANCES SPECIALIST; NOLAN LORD, SENIOR QUALITY ASSURANCES SPECIALIST, LEAD AUDITOR.</p>
<b>Auditor Recommendation</b>	<p>Auditor Recommendation</p> <p><b>RESPONSE:</b> PROCEED WITH RECERTIFICATION.</p>

### 2.1.1 Management Responsibility

The site has developed and implemented a food safety Policy Statement entitled “Food Safety and Quality Statement” (dated October 16, 2023). This statement has been implemented by senior management and signed by the Organization’s president/CEO. The Policy Statement covers customer and regulatory requirements, establishing and maintaining a food safety culture, and the use of continuous improvement of the system. The policy is communicated to the site’s staff by posting it at the entrance, the lunchroom, and several offices. The policy was written in English. An annual refreshing training was carried out on January 12, 2024.

The site has established a food safety culture program, D-QA-001, revision 2, dated April 19, 2023, which defines a food safety culture consistent, quantifiable, and essential dynamics at the warehouse level. The site has established metrics to promote a food safety culture. It is reviewed annually during the senior management review: A completion rate goal of 90% or higher for the completion of the NSM food safety Hazard Communication Form (47 of 52 forms completed)—a completion rate goal of 90% or higher for the weekly captain’s checklist. A verification of captain accountability will be conducted during the monthly facility GMP inspection, and customer complaints trending for food safety complaints resulting in  $\leq 0.5\%$  of shipments with a food safety-related issue. The site staff are required to report food safety issues to management. They are empowered to make decisions regarding food safety, as evidenced by the job descriptions and interviews with employees. The training program was in place for regulatory and food safety responsibilities. Capitan in inspection, results analysis meeting and results were used to implement strategies to improve the Food Safety Culture. These were presented to the employees on January 15, 2025. The site designated the Warehouse Manager as the (SQF Practitioner), and the Warehouse Supervisor as the SQF Practitioner backup. Both had third-party HACCP training on file dated 2022-10-25 and 2022-10-25 through the Internal Food Safety and Quality. The SQF Practitioner is responsible for the development, implementation, and maintenance of the SQF Food Safety System. The organizational chart, a live corporate document, is kept on file electronically and maintained by the Plant Manager. The chart outlined the structure of the staff. The local chart (dated February 14, 2024) noted those responsible for food safety, showing the alternates and the SQF practitioners. The job description for the warehouse manager, dated September 13, 2022, and The Warehouse Supervisor, dated October 16, 2023, were reviewed during the audit. Duties and responsibilities were properly and effectively documented.

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

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

The policy statement shall be:

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

Job descriptions for the key personnel shall be documented.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.1.1.5** The primary and substitute SQF practitioner shall:

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.1.2 Management Review**

The SQF System is to be reviewed at least annually according to the "Management Review (dated January 9, 2024), which includes food safety culture, food safety objectives, and any changes to the SQF system. Food safety fundamentals and food safety plans are to be reviewed by management when any changes are made in products and systems. The SQF practitioner is responsible for maintaining records of all reviews, validations, and changes to the SQF System. The monthly management meetings took place to ensure communication on matters impacting the SQF system (most weeks with meetings for food safety and objectives, generally at least once a month). The annual management review was performed on January 9, 2024. The annual review meeting notes were reviewed during the audit. Additionally, the NSM Joint Quality Group Conference Call Minutes from January 24, 2024, and October 18, 2023, were reviewed during the audit. Records were properly documented and maintained.

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

Records of all management reviews and updates shall be maintained.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.1.3 Complaint Management**

The written Complaint policy is entitled "Customer Complaints" (dated 9/2/2021). It defines the methods and responsibilities for handling customer complaints. Complaints are received by several departments and investigated by the Quality Manager. The site is required to perform a monthly review with trend analysis. Results through 2023 were reviewed, and there were 8 complaints in 2023. There were not any significant trends. Corrective actions, investigations, root causes, and records are required to be kept of each complaint. The Corrective Action report no. 7.4-02.0 conducted on February 12, 2024, concerning the Wrigley tote strap had frayed and was closed on the same day. The Corrective Action report was reviewed during the audit. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.2.1 Food Safety Management**

A food safety manual has been developed and is maintained electronically. Policies and procedures are documented in the manual and outline how the SQF Code is met. The food safety manual contains the scope of the certification, a list of products and processes in the scope, the organizational chart, all food safety policies, and procedures that make up the SQF System, reference to the raw material, packaging, and finished product specifications, process controls that impact food safety and the food safety regulations that apply to the manufacturing site. It is made available to all relevant staff through access to the quality department or electronic read-only. Changes to the system were to be validated or justified. No changes have been implemented that have had an impact on the site's ability to deliver safe food.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.2.2 Document Control**

The site has implemented its policy “Document Control, section 2.0” (dated 4/8/2019), defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. No issues were noted with randomly selected documents throughout the audit. Records were properly documented and maintained.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.3.1 Product for Storage and Distribution**

The "Product Storage & warehousing, section 5.10" (dated April 8, 2019) outlined the storage requirements for raw materials, work in process, and finished products. Product handling and storage requirements for all products received, stored, and intended for distribution are effectively documented, current, and approved by the site. The incoming supplies shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.3.2 Supplier Approval and Incoming Supplies**

The site has a written supplier approval program in "Supplier Approval, section 5.18" (dated April 22, 2021), which has been implemented and covers the procedures for approving suppliers of pallets and services. The policy includes specifications, the level of risk to the facility, how approved supplier status is granted, and the food fraud assessment and mitigation plan. Also included are methods to review the approved supplier performance and status. Emergency suppliers were allowed with upper management approval; however, none had been used in the past year. A register is maintained of all current approved suppliers, which was reviewed during the audit and found to be complete. Raw materials in the storage warehouse (sugar beet) were verified to have come from suppliers on the Approved Supplier List. Third-party audits were on file for the approved suppliers of these same ingredients and packaging materials, with a summary of food safety controls for the beets. The product Data Sheet for the Extra Fine Granulated Sugar 50lbs. bag, dated February 10, 2023, was reviewed during the audit. The specification defines the storage and handling conditions.



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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.3.2.2** All incoming supplies shall comply with the relevant legislation.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### 2.3.3 Contract Service Providers

The Contract Service Providers were on a master list with specifications for service descriptions. A list of current contract service providers is maintained and found to include providers of services, including pest control. Contract arrangements for pest control were reviewed during the audit and found satisfactory. The contractors were required to undergo training on their first visit to the site, as noted on the master list. The site contract service provider, dated January 9, 2024, was reviewed during the audit. The registry defines relevant training for the service providers. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### 2.3.4 Contract Third-Party Storage or Distributor

N/A 2.3.4.1-3 – The site does not utilize Contract Third-Party Storage or Distributor.

### 2.4.1 Food Legislation

The regulatory compliance policy is dated September 22, 2022. A written Technical, Regulatory, & Industry update is on file. It states that the Quality Assurance Department maintains current copies of all product legality regulations. The site is subscribed to FDA notifications. The Corporate Company is a partner with the American Society of Beet Sugar Technologists, where the Quality Assurance Manager is an approved Instructor. The Corporate company is also a partner with the Sugar Association and the International Society of Beverage Technologists. Additionally, Corporate Quality Assurance posts white papers, peer-reviewed journals, and association publications to a common location. This information includes but is not limited to the following: • SQF Certification Standard. • SQF Module 2 guidance. • SQF Module 11 guidance. • BRC Standard. • BRC Auditor Guidelines • Codex Standards for Sugar.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

#### **2.4.2 Good Production Practices**

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

**2.4.2.1** The site shall ensure the Good Storage and Distribution Practices described in Module 12 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

#### **2.4.3 Food Safety Plan**

The food safety plans were prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The facility maintains two food safety plans: D-QA-004 Food Safety Plan, dated January 9, 2024, for Storage and Distribution. The multidisciplinary food safety team responsible for the maintenance of the food safety plans includes the Warehouse Manager, Warehouse Lead, Administrative Lead, and QA Specialist. Product descriptions include product names, technical names, product descriptions, ingredients, intended consumers, shelf life, labeling instructions, FDA classification, storage requirements, distribution, technical information (chemical formula, water activity, moisture, sulfites), and preventive controls. The flow diagrams included all processes from receiving to shipping, as well as all inputs (raw materials, processing aids, water, air, packaging, transport boxcars, and trailers) and outputs (rework/WIP, waste, finished product). They were verified on January 9, 2024. The hazard analyses identify potential biological, chemical, and physical hazards at each process step and for each input. Each hazard is assessed for likelihood and severity to determine which hazards are significant and must be controlled to ensure food safety. The site did not identify a CCP within the process.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.3.5** The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw material, packaging, service inputs (e.g., water, steam, gases as appropriate), scheduled process delays, and all process outputs including waste, rework, and recoup. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.3.6** The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including food products received and stored.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.3.9** Based on the results of the hazard analysis (refer to 2.4.3.7), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (e.g., a preventive control {PC} or critical control point {CCP}).

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.3.10** For each identified step requiring control (e.g. PC or CCP) the food safety team shall document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.1.1).

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.3.12** The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at an identified step requiring control (e.g. PC or CCP). The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.4 Non-conforming Product and Equipment**

The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, and packaging in the document “Non-conforming Products & Material, section 7.0” (August 2, 2022). Methods to segregate, identify, handle, and dispose of the product include placing it in the holding area, using hold tags, and using the status electronically. Nonconforming products or equipment are required to be identified, segregated, or disposed of. No items were currently on hold at the site. The Dumping Remelt form for February 2024 for Tote # 6298 was reviewed during the audit. Records were properly documented and maintained.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.5 Product Recoup**

N/A 2.4.5.1 - There is no product Recoup.

**2.4.6 Product Release**

The facility has written procedures in “Positive Release, section 7.3” (dated April 8, 2019) implemented for releasing finished products. The procedure “Positive Release, section 7.3” (dated April 8, 2019) noted the requirements for label compliance with food legislation in the country of manufacture and countries of sale. Records for product release were reviewed during the audit, and no deviations were noted.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.4.6.2** Records of all product release shall be maintained.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.5.1 Validation and Effectiveness (Mandatory)**

The methods, responsibilities, and criteria for verifying the effectiveness of GSDPs (pre-requisite programs) have been documented and implemented. These are found in "Validation and Verification, section 8.0" (dated April 8, 2019). Records of all verification of effectiveness and validation are maintained by the warehouse manager (SQF Practitioner). The validations were required to be completed annually or in the event of changes. Records were properly documented and maintained.

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

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

Records of all validation activities shall be maintained.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.5.2 Verification Activities (Mandatory)**

The methods, responsibility, and criteria for verifying the effectiveness of monitoring prerequisite programs, critical control points, and other food safety controls identified shall be documented and implemented. The methods applied shall ensure that personnel responsible for verifying monitoring activities authorize each record to be verified. The PPRs validation and verification checks were done during the annual management review process. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

Records of verification of activities shall be maintained.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.5.3 Corrective and Preventative Action**

The Corrective and Preventative Action program is written in "Corrective Actions & Root Cause Analysis, section 1.4" (dated June 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. Records were properly documented and maintained.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **2.5.4 Internal Audits and Inspections**

The procedure for scheduling and conducting internal audits so the effectiveness of the SQF system is verified has been documented and implemented in the document "Internal Auditing & Facility Inspections, section 8.3" (dated April 8, 2019). The Internal Audit Program is maintained by the warehouse manager (SQF Practitioner). If there were any changes implemented from the internal audits that have an impact on food safety, it would trigger an SQF review. Facility and equipment inspections, internal audits of the food safety plan, and regulatory inspections are part of the internal audit programs. The frequency of the audits is communicated to management and required weekly for internal inspections and annually for internal audits. Personnel conducting audits have been properly trained and audit areas independent of their function by using teams. Records of internal inspections at the site, including inspection of the outside grounds monthly. The internal inspection records were sampled and reviewed during the audit from April 2023 to October 2023 and found to be properly documented and maintained. A full internal audit of the SQF system was completed on January 24, 2024, with records on file. The records showed conformance and nonconformities. 4 were partially compliant (OFI, an internal terminology), and 2 needed improvement. Records were properly documented and maintained.



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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.6.1 Product Identification**

A policy defining how products are identified from receipt through production and shipping has been documented in "Product Lot Number, section 4.1" (dated November 13, 2023). The identification system ensures all materials, work-in-progress, and finished goods are clearly identified at all process stages. The policy defines 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.

- 2.6.1.1** The methods and responsibility for identifying products during all stages of storage shall be documented and implemented. The product identification system shall be implemented to ensure:
- i. Proper stock rotation; and
  - ii. Accurate location of product.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

## **2.6.2 Product Trace**

A policy defines the methods and responsibilities for tracing products to the customers and from vendors of raw materials and packaging. This is written in "Traceability, section 4.4" (dated November 13, 2023). Receipt dates were recorded and used to help trace the raw materials and packaging materials. The effectiveness of the trace system is required to be conducted at least annually. Records of the receipt, use, and dispatch of products are maintained.

The backward and forward trace and recall exercise was completed on January 22, 2024, for the Tote Sacks- 2,000 lbs. sacks. The lot was AT23350 bulk, with 100% traced materials within 21 minutes. 66 were shipped to multiple locations or various work orders, and 36 were on hand; Inventory was verified.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### 2.6.3 Product Withdrawal and Recall (Mandatory)

A policy defines the methods and responsibilities for withdrawing and recalling products if necessary and is noted in "Recall, 3.2-01" (dated March 24, 2022). A recall team has been designated and is led by the Quality Manager. The withdrawal policy includes investigating a recall and determining the root cause of a recall/withdrawal with corrective action. Mock trace exercises are completed at least annually to verify the effectiveness of the system.

The backward and forward trace and recall exercise was completed on January 22, 2024, for the Tote Sacks- 2,000 lbs. sacks. The lot was AT23350 bulk, with 100% traced materials within 21 minutes. 66 were shipped to multiple locations or various work orders, and 36 were on hand; Inventory was verified. The records reviewed for this mock trace exercise showed the Product Withdrawal and Recall procedures were tested effectively forward to shipping and backward to the raw materials. This included all mock requirements, including customer information, scenarios, and mock exercises- the root cause. Corrective actions were not required as it was successful. There had not been any recalls since the last audit. The policy states that SQFI and the certification body are required to be notified in writing within twenty-four (24) hours upon identification of a food safety event that the site has initiated, which requires public notification. SQFI shall be notified at [foodsafetycrisis@sqfi.com](mailto:foodsafetycrisis@sqfi.com). Records were properly documented and maintained.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.6.4 Crisis Management Planning**

The written Crisis Management Plan is found in the Document “Business Continuity Plan” (dated January 27, 2022). The plan has been implemented and addresses known threats to business interruption. The plan noted the senior management in charge of the crisis, including the nomination of a team leader who has oversight of the plan. The local crisis management team identified and trained on 2023-02-08. The plan includes responses to an extended business interruption, isolating and identifying affected products, and a current crisis alert list. The crisis plan includes internal/external communications and sources of legal and expert advice. The mock exercise was completed on January 22, 2024, using an Extremely cold winter storm with blizzard conditions that caused a power outage to the facility at 7:16 am on Saturday, January 13, 2024. There were not any gaps in the test that required corrective actions. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.7.1 Food Defense Plan**

The facility has a Food Defense Policy "Food defense plan" (dated January 09, 2024), in which the methods, responsibilities, and criteria for preventing food adulteration have been documented. A food defense protocol includes the title of the senior management responsible for food defense. This program complied with legislative requirements. The program outlined the access of only authorized personnel, designated access points, the secured storage of materials and hazardous chemicals, and the control of access to contractors and visitors. A food defense/site security assessment was completed on January 09, 2024.

A test of the food defense program was completed on January 18, 2024, based on a security violation. No gaps were identified. The Food defense training was carried out on January 15, 2024. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;

ii. The name of the senior site management person responsible for the food defense plan;

iii. The methods implemented to ensure only authorized personnel have access to equipment and vehicles and storage areas through designated access points;

iv. The methods implemented to protect sensitive operational points from intentional adulteration;

v. The measures taken to ensure the secure receipt and storage of products, packaging, equipment, and hazardous chemicals to protect them from deliberate act of sabotage or terrorist-like incidents;

vi. The measures implemented to ensure products, packaging (including labels), work-in progress, and process inputs are held under secure storage and transportation conditions; and

vii. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.7.2 Food Fraud**

Food Fraud” (dated June 1, 2023) outlined the requirements for assessment of the raw materials, site vulnerability, and mitigation controls. A re-assessment summary was completed on February 22, 2023. There were not any gaps in this risk assessment that needed corrective actions. The risk assessment showed that there were no high-risk materials, and mitigation controls were not required. Food Fraud training was carried out on January 15, 2024. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.8.1 Allergen Management**

Even though there are no allergens present in the plant, there is a documented policy whose value is to increase awareness and to establish the necessary controls to eliminate the risk that the oil under the site's control is subject to cross-contamination with food allergens. This policy was developed to clearly explain the general procedures and guidelines that apply to the oil manufactured by Spreckels. This policy is communicated to relevant employees, and all employees are expected to adhere to the standards outlined in this policy. Last Allergen training was carried out on January 15, 2024. The site does not handle any allergen.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**2.9.1 Training Requirements**

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. This was evidenced in the facility by interviews with plant employees in production and maintenance. "Training, section 5.2-01" (dated January 15, 2024) outlined the training program. The training program includes the review of the site's food safety and quality policy, good storage and distribution practices, GMP required for exposed and non-exposed products, allergen control program, cleaning, and chemical handling, pest control practices, glass/plastic registry requirement, food security, and visitor handling procedure, food safety plans, food safety culture reviews, metrics, and SQF system overview. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

## 2.9.2 Training Program

The site has documented a training program, described in "Training, section 5.2-01" (dated June 14, 2022), which covers the necessary competencies for plant personnel. This program requires training to be conducted for new hires and refresher training to ensure regulatory, food safety, and all other requirements of the SQF System are met. This training program is administered by a QA department and HR. Work instructions have been written explaining how tasks critical to maintaining food safety are performed. Records of work instruction training were reviewed for sanitation. The SQF Practitioner was the only person who sampled for environmental and received training from the third-party lab. HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The team members had training on file. The training language and materials are in Spanish & English, which is the language used in the operation and understood by all plant personnel. Periodic refresher training needs have been identified in the Training program that noted which programs were required. The training program was in place for personnel hygiene, allergen, HACCP, food defense food fraud, and quality. Refresher training is completed on an annual basis. A training skills register is maintained by the SQF Practitioner and includes a listing of the trainee, trainer, the description of the training, the date of training, and verification by supervision that the training was completed. The facility verifies the effectiveness of training by quizzes and visual observation for certain programs. Plant employees interviewed in quality, production, and maintenance were found to have current training records on the register. Records were properly documented and maintained.

- 2.9.2.1** A training program shall be documented and implemented that, at a minimum, outlines the necessary competencies for specific duties and the training methods to be applied for personnel carrying out tasks associated with:
- i. Developing and maintaining food safety plans to meet regulatory requirements and the SQF Code;
  - ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
  - iii. Personal hygiene for all staff involved in handling of food products and food contact surfaces;
  - iv. Food Storage and Distribution Practices and work instructions for all staff engaged in food handling, food storage and transport, and associated equipment;
  - v. Allergen management, food defense, and food fraud for all relevant staff; and
  - vi. Tasks identified as critical to meeting effective implementation and maintenance of the SQF Code.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**



- 2.9.2.3** Training records shall be maintained and include:
- i. Participant name;
  - ii. Skills description;
  - iii. Description of the training provided;
  - iv. Date training completed;
  - v. Trainer or training provider; and
  - vi. Verification that the trainee is competent to complete the required tasks.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.1 Premises Location and Approval**

The sites buildings, property and surroundings were observed during the audit to not pose a risk to food safety. There was an on-going risk assessment for the local activities. If there were any changes to local activities, it was recorded on this log. The facility maintains the required approvals by relevant authorities, as evidenced by FDA registration XXXXXX7372 valid through December 31, 2024, The Business license No. XXX-XX351 valid through December 31, 2024.

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.2 Building Materials**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.2.4** Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 12.2.5).

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.3 Lightings and Light Fittings**

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or shatter-proof in product areas. The lights throughout the warehouse were LED and adequate for the warehouse function.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.4 Dust, Insect, and Pest Proofing**

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

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.5 Ventilation**

The heater air exchanger unit provides ventilation for the warehouse area, which was included in the master cleaning schedule. Condensation was not seen. Adequate ventilation was observed throughout. Positive air pressure was not required. Ventilation equipment and devices are adequately cleaned and maintained by a third-party contractor and effectively sealed against dust, insects, and other pests. The units are maintained by Temperature Services, a third-party service provider, which was on the service provider list reviewed during the audit.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.6 Equipment and Utensils**

The site has the specifications for equipment, utensils, and protective clothing written in the GMP Manual. The two equipment used at the site are forklifts and pallet inverters, which are designed, constructed, installed, operated, and maintained to meet regulatory requirements and not pose a contamination threat to products. Protective clothing is used at the site for personal safety only and does not contribute to the contamination of materials and products. Equipment, utensils, and protective clothing are cleaned after use to control contamination and stored in a clean and serviceable condition to prevent microbiological contamination. The waste material is discharged hygienically and according to local regulatory requirements. The director of warehousing at the Corporate Office is responsible for sourcing and purchasing all the equipment.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.1.7 Grounds and Roadways**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.2.1 Repairs and Maintenance**

The site does not have fulltime maintenance team on staff, and it does contract out all maintenance activities and/or requirements at the site. The Warehouse Manager (SQF Practitioner) is responsible for managing and maintaining the maintenance activities at the site. The site has established a maintenance reporting log to capture required maintenance activities for buildings and equipment. The log is utilized to plan out maintenance repair activities. The paint used at the site is suitable for its use. No temporary repairs were noted at the site; however, where required, it is documented on the maintenance reporting log, and immediate action is taken by the Warehouse Manager (SQF Practitioner) to request permanent. The maintenance reporting Log was reviewed during the audit. The incident reported on December 20, 2023, reported issued with three (3) forklift seatbelts. The warehouse manager contacted a third-party service provider, Atlas Toyota, and the repair was performed on December 21, 2023. Repair was documented and appropriate records maintained.

N/A 12.2.1.7 – The site neither handles exposed food nor opens food products.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.2.2 Maintenance Staff and Contractors**

The site does not have maintenance staff. All maintenance activities are contracted out. However, Maintenance contractors are required to be trained in good manufacturing practices and food safety. Training records were on file for maintenance contractors. Escort was required for all contractors. When repairs are completed, personnel are required to document the accounting of tools and cleanliness of the work areas, which is then followed by an inspection and release. There have not been any non-routine repairs in the last year on food contact surfaces. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.2.2.2** All maintenance staff and contractors required to work on-site shall be trained in the site’s food safety and hygiene procedures or shall be escorted at all times until their work is completed. Records of training shall be documented and retrievable.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.2.2.3** Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.2.3 Calibration**

N/A 12.2.3.1-5 - No calibration requirement. No equipment needs to be calibrated to ensure food safety.

#### 12.2.4 Pest Prevention

A policy defines the facility's program for integrated pest management in "Pest prevention" (dated April 22, 2021). No pest activity was identified or noted during the audit that presented a risk for product contamination, and corrective action and record-keeping procedures are in place should this occur, dated April 22, 2021; an annual risk assessment was carried out on June 23, 2023. This included handling any pest infestation in packaging, raw materials, or finished products, including requirements for records of any incidents. Live animals were not found inside the facility during the audit, which is prohibited. The site contracted the Fumigation Service and Supplies Inc., a third-party service provider, to monitor and manage the pest control program. The contract Signed on June 23, 203, defines the methods of pest control, frequency of interior and exterior inspections, and targeted pests.

The technician provided reports of the service completed. Licenses of the Pest Control Operator from local authorities are current and indicate employees are trained and competent. The PCO business License No. 051-024339 is valid through December 31, 2024; the Technician License No. 052-070166 is valid through December 31, 2025. The liability insurance is valid through April 1, 2024. A list of chemicals used by the pest control operator is found in the approved pesticide list and includes SDS information. The pesticide MAP was on June 23, 203, by the warehouse manager (SQF Practitioner). The Approved Chemical list was signed by the warehouse manager (SQF Practitioner) on June 23, 2023. Was reviewed during the audit. The pest control operator removes empty chemical containers from the site. Pesticides were not stored on site. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues highlighted by the Pest Control Operator are addressed and documented by the facility. Trending was found in the pest control program and completed quarterly. The services service reports from February 7, 2024, and July 13, 2023, were reviewed during the audit. Additionally, trending reports were reviewed on December 14, 2023. Records were properly documented and maintained.

N/A 12.2.4.5 – Pesticide Chemicals are not stored on site.

##### 12.2.4.1

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**



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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### 12.2.5 Cleaning and Sanitation

The sites have a Cleaning and Sanitation Program, dated April 8, 2019, that describes the methods and responsibilities for cleaning processing equipment, the environment, storage areas, bathrooms, and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods, and who is responsible. A master sanitation plan includes all areas of the site with frequencies and responsibilities for deep cleaning. A review of the plan for 2022 showed tasks were completed as scheduled. Methods for recorded and scheduled verification of the effectiveness of cleaning are documented. Cleaning verification completed in the Weekly Operational Inspection Form for May and June was reviewed and found satisfactory. Cleaning materials are stored securely and properly labeled, with SDS information available to all employees. Cleaning chemicals for the floor cleaner and bathrooms were observed to be included on a list of approved chemicals, labeled consistent with regulations, and had SDS on hand. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted on January 15, 2024.

The Master Sanitation Schedule, Warehouse General January 22-26, 2024, and May 8-12, 2023, were reviewed during the audit, identifying the daily and weekly activities and with the Supervisor's initial for completion. The Master Sanitation Schedule, Warehouse Monthly/Quarterly for the 3rd quarter of 2023, was reviewed during the audit. The list shows the months, activities to be completed, the frequency, and the technician and supervisor verification for the cleaning activity. There is no chemical mixing onsite. The site utilizes general household cleaning chemicals and sanitizer to perform its cleaning activities. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

### **12.3.1 Personnel Welfare**

A Good Manufacturing Practice policy for all employees has been documented and implemented in "GMPs, section 5.1" (dated October 30, 2023). Employees are prohibited from working in warehouse areas when suffering from infectious and communicable diseases or have been exposed to cuts, sores, or lesions. The policy requires that minor cuts or abrasions be covered with a waterproof, metal-detectable, and colored bandage. The bloodborne pathogens program addresses the cleaning of a bodily fluid spill. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. Records were properly documented and maintained.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.3.2 Handwashing**

Hand wash sinks were seen to be available at accessible locations for employees. Sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser and waste containers are available. Signs are posted reminding employees to wash their hands, and employees who wear gloves are also required to follow the hand wash procedures. Interviews conducted with the Forklift Driver and Warehouse Support person during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit. Signage in appropriate languages instructing employees to wash their hands posted in a prominent position.  
N/A 12.3.2.5 – Gloves are not used at the site.

- 12.3.2.1** All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors:
- i. On entering food handling, storage, and processing areas;
  - ii. After each visit to a toilet;
  - iii. After using a handkerchief;
  - iv. After smoking, eating, or drinking; and
  - v. After sneezing or coughing.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

- 12.3.2.2** Handwash stations shall be available and accessible as required.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

- 12.3.2.3** Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with:
- i. A potable water supply at an appropriate temperature;
  - ii. Liquid soap;
  - iii. Paper towels; and
  - iv. A means of containing used paper towels.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.3.3 Clothing and Personal Effects**

A policy, based on a documented risk assessment, found in "GMPs, section 5.1" (dated October 30, 2023) defines the site's clothing requirements and has been implemented. Clothing, including shoes, is required to be clean at the commencement of the shift. Employees were observed to comply with the clothing requirements of the facility. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management.  
N/A 12.3.3.3 - Protective clothing is not required at the site.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

#### **12.3.4 Visitors**

A policy defining visitor and contractor requirements (dated April 8, 2019) has been documented in Contractor & Visitor Policy and implemented. The policy requires that visitors and contractors follow GDPs defined by the sites, enter, and exit through proper access points, follow hand wash requirements as applicable, wear suitable clothing and footwear and have an absence of visible signs of illness. A policy to manage driver access and designated driver area was in place and was complied with during sites tours. Visitors to the site scan the QR code, review GMP and sign the compliance document.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

A documented Weekly Master Sanitation Schedule describes the processes, chemicals, and frequency of cleaning the personnel and ancillary areas of the facility. Employee bathrooms and break rooms were observed to be appropriately lit, ventilated, and available for all personnel at the facility. Provisions have been made for the storage of street clothing and personal items, which are separate from storage areas. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with the SQF Practitioner, combined with onsite observations, provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Designated cleaning tools for the restrooms are in place. Lunchrooms that are properly separated from production are available, well-lit, properly ventilated, and appropriately sized for the number of facility employees. Lunchrooms include hot and cold potable water, food storage areas, and refrigerators with hand and utensil washing capabilities. Outside eating areas are properly maintained to prevent contamination and pest risks. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunchrooms. Lunchrooms were observed to be clean and well-maintained during the audit. Signage in languages understood by staff advising people to wash their hands before entering the warehouse storage areas is posted in a prominent position in break rooms and break room exits.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

- 12.3.5.4** Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.4.1 Personnel Processing Practices**

The plant neither handles nor opens products on sites. Operators observed in the warehouse followed personnel processing practices defined in the Good Distribution Practices Policy. The employees and visitors are required to report COVID, sore throat, and coughing through a set of questionnaires that must be reviewed and signed before entering the building. Employees were trained on GMP requirements and practices on January 15, 2024. Records were properly documented and maintained.



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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.5.1 Water Supply**

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from Bensenville, with a current water report on file for 2022. It was determined that there was adequate hot and cold water for cleaning and processing. Non-potable water systems fire suppression-sprinkler were properly designed and were observed to be separated from the potable source. There are three (3) backflow prevention on the main line for water sources, which we tested/calibrated on November 11, 2023, by Tailer Plumping company. Records were properly documented and maintained.  
N/A 12.5.1.6 - Water is not stored on sites.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.5.1.4** 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:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.5.2 Water and Ice Quality**

N/A 12.5.2.1-2 - Water is not required to be treated or tested at the site as it is not used in processing.

N/A 12.5.2.3 – No Ice rooms at the site.

**12.5.3 Air and Other Gases**

N/A 12.5.3. 1-2 – Compressed air does not contact food or food contact surfaces.

**12.6.1 Receipt, Storage and Handling of Goods**

Product Storage & warehousing, section 5.10" (dated April 8, 2019) outlined the storage requirements for raw materials, work in process, and finished products. This same policy outlined stock rotation based on FIFO and lot number. Storage rooms for raw materials, finished goods, containers, and equipment were observed to be well-designed and constructed. Temporary or alternative storage was not used. The product is stored at ambient temperature. No freezer or refrigerated storage onsite. Racks are constructed of impervious materials and designed to enable effective cleaning.

N/A 12.6.1.2 – The product is stored at ambient temperature. No freezer or refrigerated storage onsite.

N/A 12.6.1.5-6 – The site does not use Temporary or alternative storage.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.6.1.7** Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.6.2 Cold Storage, Freezing and Chilling of Foods**

N/A 12.6.2. 1-5 - No Cold Storage, Freezing, and Chilling of Foods on site.

**12.6.3 Storage of Dry Goods**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

The site's hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. Chemical storage areas were observed to be locked, and instructions were given on handling hazardous chemicals. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility and are used according to the label. SDS and the label declaration for the chemical's intended use were reviewed and found in the SDS binder. Empty containers are rinsed and stored in the dumpster to prevent reuse. Chemical training was carried out on January 15, 2024.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.6.5 Loading, Transport, and Staging Practices**

Loading, Transport, and Unloading Practices” (dated April 8, 2019) defined the practices for loading and unloading food products. It was observed during the audit tours that food is unloaded, stored, and loaded under conditions that prevent cross-contamination. The facility’s policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading. Documentation was reviewed for 2023-03-02. It was observed during the audit tours that loading practices do not expose products to detrimental conditions. Seals were placed on each outbound load and noted on the BOL. All shipping is ambient. Warehouse interviews revealed that employees are aware of the proper procedures and follow them. It was observed that unloading practices are designed to prevent product contamination. All receiving is ambient. Dry ingredients and packaging were observed to be stored separately from unprocessed raw materials. All Products handled by the site do not require storage under refrigeration temperature.

N/A 12.6.5.5-6 – Products handled by the site do not require storage under refrigeration temperature.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.7.1 High-Risk Processes**

N/A 12.7.1.1 - The site does not conduct nor handle high-risk processes.

**12.7.2 Control of Foreign Matter Contamination**

A policy, "Physical contaminant control" (dated September 12, 2019) defining the methods and responsibilities for preventing foreign material contamination has been documented and implemented. Weekly operational inspections and regularly scheduled maintenance inspections are conducted and documented for the condition of equipment and any potential contaminants. Glass is not permitted in food storage zones except for product in glass packaging. A glass register has been documented detailing glass, brittle plastic, and ceramic sources in all areas of the plant.

The site prepared and verified the glass register is current as of February 19, 2019. Monthly inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted in February 2024, April 2023, and August 2023, were reviewed during the audit. Wooden pallets were clean, in good condition and subject to regular inspection. Periodic maintenance inspections include looking for loose objects and for potential contaminants from overheads.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.7.3 Managing Foreign Matter Contamination Incidents**

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

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.8.1 Waste Disposal**

A policy, entitled "Waste Disposal, LA" (dated April 8, 2019) defining the methods and responsibilities for handling dry, wet, and liquid waste has been documented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins, and storage areas were observed to be well maintained and clean on the exterior of the facility. Solid waste from processing was observed to be properly disposed of. Animal feed is not generated. Trademarked materials were sent to a landfill with certificate of destruction according to the same policy. The site utilizes the services of Waste Management company for all waste removal from the site, which they service the site twice per week.

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**

**12.8.1.5** Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

**RESPONSE: COMPLIANT**

**EVIDENCE:**

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

**RESPONSE: COMPLIANT**



**EVIDENCE:**

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

**RESPONSE: COMPLIANT**

**EVIDENCE:**