



## GMP Inspection Results Report

Consolidated Standards for Inspection: Food Distribution Centers

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The AIB International Consolidated Standards for Inspection are statements that represent key requirements that a facility must meet in order to keep products manufactured, processed or handled in a facility wholesome and safe. The Standards reflect what an inspector would expect to see in a facility that maintains a food-safe processing environment.

This report details the findings from an AIB International inspection against the Consolidated Standards. The document contains the following sections:

Document Section	Description
Score and Rating	<ul style="list-style-type: none"> <li>x Description of the facility</li> <li>x Number of findings and related risks</li> <li>x Category scores and total score</li> <li>x Rating</li> </ul>
Participant Names	Personnel from the facility who accompanied the inspector
Facility-Specific Questions	Technical information about a facility. For example: bulk materials used, temperature control equipment used.
Location Matrices	Two matrices which categorize findings by Category and Risk
Findings with Risk	Descriptions and recommendations related to all findings
Corrective Actions	The same content as the Findings with Risk page with additional blank columns added for convenient Corrective Actions tracking
Additional Comments	Comments made by the inspector that have no risk assessment
Standards without identified Risks or Findings	Standards that are applicable to the inspected facility, but based on random review and observation samplings at the time of the inspection, the facility appears to be meeting requirements
Standards Not Applicable	Standards that are not applicable to the inspected facility

## Score and Rating

### Inspection Information:

Facility Name	National Sugar Marketing, LLC
Facility Address	5150 Edison Ave Chino, California 91710 United States of America
Products Produced	Storage for super sacks and pallets of granulated sugar.
Account #	29616

Standard Used	Food Distribution Centers
Date(s) of Inspection	11-Mar-2021
Audit Type	GMP
Inspection Type	Scored
Announcement Type	Announced

Expected Scope	
Variations From Expected Scope	

Reinspection	No
Terminated	No

### Score

Category	Minor Issues Noted (180-195)	Improvement Needed (160-175)	Serious (140-155)	Unsatisfactory <= 135	Scores
Operational Methods and Personnel Practices	0	0	0	0	200
Maintenance for Food Safety	2	0	0	0	190
Cleaning Practices	0	0	0	0	200
<b>Integrated Pest Management</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>200</b>
Adequacy of Prerequisite and Food Safety Programs	2	0	0	0	190
Total Score					980

The official version of this report is a certified pdf issued by AIB International

Disclaimer: AIB International Inc. states that this report as dated and provided herein is to be construed as its findings and recommendations, category scores, total score, and rating. A passing score of 700 and above is not a certification of the facility, products, or programs. AIB International Inc. does not accept or assume responsibility for the Prerequisite and Food Safety Programs in effect with the customer named on the title page of this report (the customer). AIB International Inc. is only reporting the food safety conditions of the customer as of the date of this report and assumes no responsibility or liability as to whether the customer does or does not carry out the recommendations as contained in this report.

## Participant Names

Name	Role	Inspection	Closing Meeting
Mr. Jeremy Adamson	Director of Quality Assurance	Yes	Yes
Mr. Jose Callejon	Warehouse Manager	Yes	Yes
Mr. Nolan Lord	Sr. QA Specialist	Yes	Yes
Henry Weiss	Auditor	Yes	Yes

## Facility-Specific Questions

#	Question	Comments
1.1	The Facility Specific Questions have been removed from this section of the report. The information that was previously provided here is now included in the body of the report.	See Report.

## Findings by Location and Category

Locations	Operational Methods and Personnel Practices	Maintenance for Food Safety	Cleaning Practices	Integrated Pest Management	Adequacy of Prerequisite and Food Safety Programs	Totals by Location
Employee Welfare Areas	0	1	0	0	0	1
Facility Overview	0	0	0	0	2	2
Receiving Area	0	1	0	0	0	1
Totals by Category	0	2	0	0	2	4

## Findings by Location and Risk

Locations	Minor Issues Noted	Improvement Needed	Serious	Unsatisfactory	Totals by Location
Employee Welfare Areas	1	0	0	0	1
Facility Overview	2	0	0	0	2
Receiving Area	1	0	0	0	1
Totals by Risk	4	0	0	0	4

## Findings with Risk

#	Risk	Standard	Standard #	Requirement #	Location	Finding	Recommendation
1	Minor Issues Noted (MI)	Walls	2.6	2.6.1.2	Receiving Area	Cracks were noted in wall surfaces. The base of the wall near the receiving door was not sealed (approximately two-feet in length), along with an electrical junction box, which was damaged. No evidence of pest activity was observed.	To facilitate cleaning and to eliminate potential pest harborage areas, it was recommended that the base of the wall and the junction box be sealed.
2	Minor Issues Noted (MI)	Hand Washing Facilities Design	2.20	2.20.1.1	Employee Welfare Areas	Hot water was not always readily available in a timely manner at hand wash sinks. In the men's and women's restroom, as well as the hand wash sinks in the office, hot water took a few minutes to reach the faucet.	It was recommended that hot water be provided to the hand wash sinks in a timely manner.
3	Minor Issues Noted (MI)	Chemical Control Program	5.7	5.7.1.2	Facility Overview	The Chemical Control Program did not address all procedures that were applicable to this facility. All requirements have been met, with the exception of a policy regarding contractor chemicals.	It was recommended that the Chemical Control Program be amended to include a policy regarding contractor chemicals.
4	Minor Issues Noted (MI)	Preventive Maintenance Program	5.12	5.12.1.1	Facility Overview	A Preventive Maintenance (PM) Program and work order system was implemented for this facility; however, the finding of issues, such as hot water not delivered to hand wash sinks in a timely manner and unsealed wall/floor junction/electrical box in the receiving area, indicates that these need to be addressed in the PM Program.	It was recommended that the regular inspection and maintenance of all hand wash sinks and floor/wall junctions be included in the PM Program.



## Corrective Actions Worksheet

#	Risk	Standard	Standard #	Requirement	Location	Finding	Recommendation
1	Minor Issues Noted (MI)	Walls	2.6	2.6.1.2	Receiving Area	Cracks were noted in wall surfaces. The base of the wall near the receiving door was not sealed (approximately two-feet in length), along with an electrical junction box, which was damaged. No evidence of pest activity was observed.	To facilitate cleaning and to eliminate potential pest harborage areas, it was recommended that the base of the wall and the junction box be sealed.
2	Minor Issues Noted (MI)	Hand Washing Facilities Design	2.20	2.20.1.1	Employee Welfare Areas	Hot water was not always readily available in a timely manner at hand wash sinks. In the men's and women's restroom, as well as the hand wash sinks in the office, hot water took a few minutes to reach the faucet.	It was recommended that hot water be provided to the hand wash sinks in a timely manner.
3	Minor Issues Noted (MI)	Chemical Control Program	5.7	5.7.1.2	Facility Overview	The Chemical Control Program did not address all procedures that were applicable to this facility. All requirements have been met, with the exception of a policy regarding contractor chemicals.	It was recommended that the Chemical Control Program be amended to include a policy regarding contractor chemicals.
4	Minor Issues Noted (MI)	Preventive Maintenance Program	5.12	5.12.1.1	Facility Overview	A Preventive Maintenance (PM) Program and work order system was implemented for this facility; however, the finding of issues, such as hot water not delivered to hand wash sinks in a timely manner and unsealed wall/floor junction/electrical box in the receiving area, indicates that these need to be addressed in the PM Program.	It was recommended that the regular inspection and maintenance of all hand wash sinks and floor/wall junctions be included in the PM Program.

Root Cause Analysis	Action	Status	Date	Who	Verified By
The base of the wall was sealed last year but apparently, the epoxy used did not cover the crack 100%. It appears the electrical junction box was damaged by a forklift driver.	Both the base of the wall and the junction box have been sealed.	COMPLETED	3/17/2021	H.SANTOYO	J. CALLEJON
Due to the large office space and the location of the water heater, it takes some time for the hot water to reach the office restrooms. This only happens in the mornings when the hot water has not been used for several hours.	A plumbing company was contacted and they made an adjustment to the water heater. As per the AIB Auditor's recommendation, the hot water faucet in the office bathrooms will be opened by the first person arriving in the morning to "prime" the hot water.	COMPLETED	4/5/2021	D. HERNANDEZ	J. CALLEJON
NSM-Chino was unaware of this policy.	The Chemical Control Program now included a policy regarding contractor chemicals. We have also spoken with our landscaping and forklift contractors to provide us with a list of the chemicals the use in our property.	COMPLETED	3/26/2021	D. HERNANDEZ	J. CALLEJON
The regular inspection of sinks was never included in the PM program. Floor and wall junctions is currently listed.	The PM program has now been modified to include sinks.	COMPLETED	3/17/2021	C. RAMIREZ	J. CALLEJON

## Additional Comments

#	Risk	Standard	Standard Requirement	Location	Finding	Recommendation
1	Comments	Storage Practices	1.3	1.3.1.1	Facility Overview	Storage and removal practices were done in a way to prevent contamination. The facility stores super sacks and pallets of bagged granulated sugar. No racking is used. No coolers.
2	Comments	Cleaning Tools and Utensils	3.3	3.3.1.6	Facility Overview	Cleaning tools and utensils were labeled or color-coded to separate them based on their intended use. Cleaning tools were properly identified and stored.
3	Comments	Integrated Pest Management (IPM) Program	4.1	4.1.1.1	Facility Overview	A written Integrated Pest Management (IPM) Program was in place for this facility. The IPM Program is contracted to Terminix.
4	Comments	Facility Assessment	4.2	4.2.1.1	Facility Overview	Trained personnel conducted the facility assessment at least annually and records were current. The last assessment was conducted February 8, 2021.
5	Comments	Pesticide Documentation	4.5	4.5.1.1	Facility Overview	Labels were provided for the pesticides listed as being applied at the facility. Labels maintained included Terad3 AG (EPA #12455-116).

6	Comments	Accountability	5.1	5.1.1.3	Facility Overview	Written procedures were provided to meet legislative requirements and registrations as applicable were on file. The FDA registration and local business license were up-to-date.	
7	Comments	Food Defense Program	5.15	5.15.1.1	Facility Overview	Food Defense trained personnel had conducted a vulnerability assessment. This was reviewed at least annually or as required by regulations. The assessment was conducted March 2, 2021.	
8	Comments	Traceability Program	5.16	5.16.1.4	Facility Overview	The Traceability Program was tested twice annually. The test results were documented and included the actual results, success rate, timings, corrective actions and progress improvements where gaps in the program have been identified. The last exercise was conducted February 18, 2021.	

## Standards without identified Risks or Findings

Based on random review and observation samplings at the time of the inspection, the facility appears to be meeting the requirements of the following Standards:

Standard	Standard #	Standard Goal
Rejection of Shipments/Receipt of Dry Goods	1.1	Random review of records and programs related to safeguarding of food products by identifying and barring entry to potentially contaminated raw materials indicate they met the requirements of the standard as applicable to this site.
Storage Practices	1.3	Materials appeared to be stored in a way that met the program requirements as defined by this site, as well as the applicable requirements in the standard.
Storage Conditions	1.4	Raw materials and finished products appeared to be stored in a clean storage area and were protected from contamination as observed during the inspection.
Raw Material/Finished Product Inventory	1.5	Raw material and finished product inventories appeared to be maintained at a reasonable volume. Random review of materials did not identify aged or infested materials during the inspection.
Pallets	1.6	Pallets examined were found to be clean and well maintained.
Waste Material Disposal	1.16	Waste material and waste material removal were managed to avoid product contamination.
Single-Service Containers	1.20	Single-service containers appeared to be properly disposed of to prevent reuse.
Cross Contamination Prevention	1.23	Incompatible or hazardous materials observed during the inspection appeared to be segregated and handled to prevent product contamination.
Finished Product Transportation	1.25	Transportation and finished product coding randomly reviewed during the inspection was provided in a manner to allow traceability of materials. Transports examined during the inspection were found to be clean and in good condition.
Hand Washing Facilities	1.26	Hand washing facilities examined during the inspection appeared to be appropriately located, functional, and stocked to allow hand washing to occur.
Washrooms, Showers, and Locker Rooms	1.27	Employee welfare areas examined were maintained in good condition.
Personal Hygiene	1.28	No personal hygiene practices issues were identified during the inspection.
Personal Items and Jewelry Control	1.31	No issues with the control of jewelry or personal items were identified during the inspection.
Health Conditions	1.32	Health policies were defined for the facility. No issues that were inconsistent with these policies were identified.
Non-Facility Personnel	1.33	Non-facility personnel were observed to be in compliance with the facility defined GMP Programs.
Facility Location	2.1	No evidence of issues from local activities or the facility location were identified during the inspection.

Outside Grounds and Roof	2.2	Facility grounds appeared to be well maintained. No issues were identified.
Layout	2.3	No issues with placement of equipment and structures were identified. Appropriate access for cleaning, inspection, and maintenance activities was noted.
Floors	2.4	Floor surfaces observed during the inspection were found to be in good condition.
Drains	2.5	Drains examined during the inspection were found to be in good condition.
Ceilings and Overhead Structures	2.7	Overhead structures that could be examined were found to be clean and in good condition.
Glass, Brittle Plastics, and Ceramics Control	2.8	No issues with glass, brittle plastics, or ceramics were identified during the inspection.
Air Makeup Units	2.9	Filters and screens examined during the inspection were found to be well maintained and in good condition.
Pest Prevention	2.10	No identified issues with building maintenance were observed that would allow pest harborage or entry into the facility.
Cross Contamination Prevention	2.13	Segregation of operations based on process flow appeared to be practiced as observed during the inspection.
Equipment and Utensil Construction	2.14	Equipment and utensils observed during the inspection were designed and made of materials to allow easy cleaning and maintenance.
Temporary Repair Materials	2.15	Temporary repairs noted during the inspection were consistent with the facility defined program.
Transporting Equipment	2.18	Transporting equipment appeared to be well maintained at the time of the inspection.
Parts Storage	2.19	Parts were found to be clean and properly stored at the time of the inspection.
Cleaning	3.1	Cleaning appeared to be completed in a way to prevent contamination of raw materials, products, and equipment.
Cleaning Compounds and Sanitizers	3.2	Approval and verification procedures were in place for cleaning compounds and sanitizers used at the facility for food contact cleaning. Approval documentation was provided for the chemicals that were selected and reviewed.
Cleaning Tools and Utensils	3.3	Cleaning tools and utensils appeared to be managed and maintained to prevent product contamination. No issues were identified.
Cleaning Equipment	3.4	Cleaning equipment appeared to be managed and maintained to prevent product contamination. No issues were identified.
Daily (Housekeeping) Cleaning	3.5	No issues were identified with daily housekeeping practices observed during the inspection.
Periodic Cleaning Tasks / Product Zone Cleaning	3.7	Review of cleaning of product zone areas observed during the inspection indicated that these processes appeared to be effective. No issues were identified.

Maintenance Cleaning	3.8	Maintenance cleaning tasks were efficiently completed in a way that would not compromise product safety. This included removal of debris after maintenance work was complete, and accounting for small items such as nuts, bolts, washers, wire pieces, tape, welding rods and other.
Non-Product Zone and Support Area Cleaning	3.9	Non-product zone and support area cleaning appeared to be completed. No issues were identified.
Integrated Pest Management (IPM) Program	4.1	A written IPM Program outlining controls and processes to minimize pest activity were defined.
Facility Assessment	4.2	An annual assessment of the IPM Program was documented and current.
Scope of Service	4.3	The scope of service was clearly defined and included all applicable pest management activities for this facility.
Credentials and Competencies	4.4	Qualifications examined for selected IPM service providers were documented and current.
Pesticide Documentation	4.5	Pesticide labels and other applicable technical information were provided for the pesticides randomly examined during the inspection.
Pesticide Application Documentation	4.6	Pesticide application documentation was current and provided records to identify, document, and verify use of pesticides randomly examined during the inspection.
Trend Analysis	4.8	Service records of monitoring devices and pest sightings reviewed appeared to be used to identify and eliminate areas of pest activity as noted by the lack of significant activity observed during the inspection.
Monitoring Device Documentation	4.9	Monitoring devices were mapped and maintained to ensure proper placement and monitoring for pest activity and trending. The map appeared to be current based on observation during the inspection.
Exterior Rodent Monitoring Devices	4.10	Exterior rodent control devices were placed and those randomly reviewed were maintained to provide rodent monitoring and to deter entry into the facility.
Interior Rodent Monitoring Devices	4.11	Interior rodent monitoring devices were placed and those randomly reviewed were maintained to identify and capture rodents that have gained access to the facility.
Insect Light Traps	4.12	Insect light traps were provided and those reviewed were maintained to identify and monitor flying insects in the facility.
Bird Control	4.14	Bird control activities were addressed and the lack of activity noted during the inspection indicated that the program was effective.
Wildlife Control	4.15	No issues with identification or elimination of wildlife habitat were noted.
Identified Pest Activity	4.16	No evidence of rodent, bird, insect, or other pest issues were identified during the inspection.
Accountability	5.1	Management authorization and support of supervisory compliance to programs, laws, and regulations was defined for this site and appeared to be implemented.

Support	5.2	Human and financial resources were provided to support implementation of the Food Safety and Prerequisite Programs.
Training and Education	5.3	Regularly scheduled training activities were documented and consistently carried out to ensure appropriate implementation of Food Safety and Prerequisite Programs at this facility. Records of training that were randomly reviewed were current.
Self-Inspections	5.4	Monthly documented self-inspections were carried out to assess how well the facility was implementing and monitoring Prerequisite and Food Safety Programs. Random review of the self-inspections indicated that they were current and Corrective Actions were defined and carried out.
Written Procedure Audits	5.5	Written procedure audits were documented to validate the appropriateness and implementation of procedures defined for this site. Records randomly reviewed indicated that audits were conducted and current.
Customer Complaint Program	5.6	A Customer Complaint Program was implemented to respond to customer concerns. Protocols were in place to ensure that food safety issues were responded to in a prompt and effective manner, whether it be at the facility level or as managed by corporate.
Allergen Control Program	5.9	Allergen controls were implemented to identify allergen control throughout the process from receiving to distribution of product. Random review of the program, records, and observations during the inspection indicated that the program was implemented.
Glass, Brittle Plastics, and Ceramics Program	5.10	A documented Glass, Brittle Plastics, and Ceramics Program was provided to identify processes that prevent contamination of product. There were no identified deficiencies noted during the inspection to indicate that the program was ineffective.
Cleaning Program	5.11	A Cleaning Program with schedules and procedures for accomplishing cleaning tasks critical to maintenance of the food processing environment was documented. Random review of schedules and cleaning procedures, in addition to observations, indicated that the program appeared to be effective.
Receiving Program	5.13	The Receiving Program implemented at the facility outlined and identified requirements for the raw materials received at this site. Random review of the program and documentation of receipt of materials indicated that materials receipts were consistent with the defined program requirements.
Regulatory Affairs and Inspections Program	5.14	A documented Regulatory Affairs and Inspections Program provided instructions for handling of regulatory, third party, and customer inspections.
Food Defense Program	5.15	A Vulnerability Assessment was performed to identify and reduce the risk of intentional harm to the facility, its personnel, and food products. No inconsistencies with the Food Defense Program, as defined for the facility, were identified during the inspection.



Traceability Program	5.16	The written Traceability Program defined the methodology to allow quick location of suspect raw materials, food contact packaging materials, rework, and related finished products.
Recall/Withdrawal Program	5.17	The written Recall/Withdrawal Program documented the procedures for quick and controlled recovery of product from the market. Random review of the records and mock recovery exercises indicated that the program was implemented as defined for this facility.
Nonconforming Product Program	5.18	The Nonconforming Products Program defined the guidelines for isolation, investigation, and disposition of raw materials, packaging materials, work-in-progress, returned goods, and finished products as applicable to the facility. Random review of records and observations during the inspection did not identify any current deficiencies with this program.
Food Safety Plan	5.23	A Food Safety Plan that evaluated the hazards associated with the raw materials and processes related to product or food category was defined and implemented for the facility. This included the hazard analysis and identification of critical control points, as applicable, to prevent, eliminate, or reduce these hazards to an acceptable level. Random review of records indicated that the facility met the CCPs and/or Preventive Control requirements and that appropriate deviation procedures were implemented as identified by the program.
Design Standards	5.26	Structural and equipment design standards were implemented to aid in maintenance of food safety programs.
Water Quality	5.27	Water, water sources, and water management strategies were implemented to ensure safe water for product contact and use. Random reviews of the records indicated that programs were implemented.

## Standards Not Applicable

Standard #	Standard Name
1.2	Rejection of Shipments/Receipt of Perishables
1.7	Carry-over and Rework
1.10	Sampling Procedures
1.17	Ingredient Containers, Utensils, and Tools
1.22	Controlled Temperature for Food Safety
2.11	Leaks and Lubrication
2.16	Equipment Calibration
2.22	Ammonia Control
4.7	Pesticide Control
4.13	Pheromone Monitoring Devices
5.8	Microbial Control Program
5.25	Release Procedures