SQF Food Safety Audit Edition 9
Chairmans Foods - Chairmans Foods

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
53596 | 163978

AUDIT RATING
98
Excellent

DECISION DATE
11/17/2022

AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
10/20/2023

AUDIT DATES
10/17/2022 - 10/19/2022

EXPIRATION DATE
01/03/2024

ISSUE DATE
12/06/2022

Facility & Scope

Chairmans Foods (43910)
Chairmans Foods
1333 Cusseta Road
Suite 1
Columbus, GA 31901
United States

Food Sector Categories:
20. Recipe Meals Manufacturing

Products:
Beef and Macaroni, Boiled Rice, Cooked Gumbo, Gravy, Cooked Macaroni and Cheese, Cooked Potato Based Products, Alfredo Sauce, Cooked Seasoned Vegetables (Leafy Greens, Beans, Creamed Corn, Okra and Tomato)

Scope of Certification:
Manufacturing, storage, distribution of Fully Cooked and Heat Treated Vegetables, Casseroles, Sauce, Pasta & Soup- Frozen and Refrigerated

Certification Body & Audit Team

DNV GL
1400 Ravello Drive
Katy, TX 77449
United States

CB#: CB-1-DNV
Accreditation Body: ANSI
Accreditation Number: 0848

Lead Auditor: Arrighi, Wayne (123246)
Technical Reviewer: Szulczewski, Eric (131290)

Hours Spent on Site: 20
Hours of ICT Activities: 0
Hours Spent Writing Report: 4

Non-Conforming

11.1.7 Equipment and Utensils

Equipment are designed with impervious material and ease of cleaning. All overflows are discharged directly to the drain. All utensils are colored coded and designed for the required task. A contracted laundering service supplies the uniform/protective clothing to the company. Racks for clothing are located in employee change- rooms. All cleaned equipment + utensils are cleaned daily or as needed and stored to prevent microbiological contamination. Identification of the utensils is performed by them being color coded. For cleaning: White, Yellow and S.S.- Edible; Red + Blue - Inedible; Green - Sanitizer; Grey - Trash; Blue Scrub Brush- Floors and Black Scrub Brush - Drains. The auditor reviewed the vendor literature for the utensils that come into contact with food contact surfaces: Sparta Tank & Kettle Brush(FDA Compliant) - White; Item # 6387 20761 and Scoop Stainless Steel, 32 oz; Model # 3013 4003. Both were either NSF certified or meet FDA standards for use with foods. MINOR: During the audit of the 2 onsite storage freezers and the Filling Room, the following was observed: 1) an excessive amount of ice buildup on the ceiling mounted cooling units requiring pallets of raw materials and finished product to be removed from storage directly below them. 2) the door to the Finished Product storage freezer is operational but is damaged resulting in it not capable of properly sealing the entrance to the freezer (a sizable open space exist when closed). 3) a protective cover to a ceiling mounted emergency light has been removed resulting in ice buildup on the exposed electrical wiring and 4) an open ended wrench with a peeling ID label was lying near the Wolf Bagger.

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

RESPONSE: MINOR

EVIDENCE: During the audit of the 2 onsite storage freezers and the Filling Room, the following was observed: 1) an excessive amount of ice buildup on the ceiling mounted cooling units requiring pallets of raw materials and finished product to be removed from storage directly below them. 2) the door to the Finished Product storage freezer is operational but is damaged resulting in it not capable of properly sealing the entrance to the freezer (a sizable open space exist when closed). 3) a protective cover to a ceiling mounted emergency light has been removed resulting in ice buildup on the exposed electrical wiring and 4) an open ended wrench with a peeling ID label was lying near the Wolf Bagger.

ROOT CAUSE: Ice on the ceiling: Inadequate cleaning frequency causing ice buildup above the cooling units. Finished goods Freezer Door: Damaged due to forklift impact. This door is capital expenditure and quote is submitted to be replaced. Missing Protective cover on emergency light: Oversight from Management Wrench had a peeling ID label: Oversight from Production Supervisor. Tools are always engraved. Corrective Actions: Ice on the ceiling: Shipping Manager conducted a training with his team to ensure that the freezer ceiling will be scrapped off ice once a week. Finished Goods Freezer Door: Maintenance straightened the door to make sure that there is no gap when the door is closed. There is a functioning air curtain that is in place to ensure that there is no pest intrusion or loss of cooling. Also, there are plastic curtains behind this door to make sure that there is no pest intrusion or loss of cooling. A quote had been submitted to fix this door. Missing protective cover on emergency light: The light was removed from the area and the wires exposed were ran back into the conduit to prevent any ice build up on exposed wires. Wrench with peeling ID label: The wrench was immediately removed and engraved. A retraining was performed with all Supervisor to make sure equipment is always engraved and labels are not placed on them for identification.

CORRECTIVE ACTION: Ice on the ceiling: Shipping Manager conducted a training with his team to ensure that the freezer ceiling will be scrapped off ice once a week. Finished Goods Freezer Door: Maintenance straightened the door to make sure that there is no gap when the door is closed. There is a functioning air curtain that is in place to ensure that there is no pest intrusion or loss of cooling. Also, there are plastic curtains behind this door to make sure that there is no pest intrusion or loss of cooling. A quote had been submitted to fix this door. Missing protective cover on emergency light: The light was removed from the area and the wires exposed were ran back into the conduit to prevent any ice build up on exposed wires. Wrench with peeling ID label: The wrench was immediately removed and engraved. A retraining was performed with all Supervisor to make sure equipment is always engraved and labels are not placed on them for identification.

Corrective Actions.pdf

Freezer Door Quote.pdf

Freezer Ice cleaning training.pdf

Training on engraving tools.pdf

VERIFICATION OF CLOSEOUT: The auditor reviewed the training documents and quote for the door. This submission meets the criteria of the SQF code element 11.1.7.2

COMPLETION DATE: 11/11/2022 **CLOSEOUT DATE:** 11/13/2022

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

Daily supplies of cleaning chemicals are properly stored in a locked cage area away from the processing/packaging areas, as well as in the Maintenance storage and Boiler areas. No risk to food products was observed. No pesticides are stored on site. Chemicals have adequate storage for their use and facility's needs. The area is secured via a lock and accessible by authorized personnel only. The site has a current Approved Chemical Inventory Control Listing performed weekly by the site's employees. There is an emergency eye-wash station and shower located in the caged storage area. The site has spill kits located at strategic areas of the site. SDS's are maintained and assessable upon request. The auditor reviewed the SDS's for the following chemicals: Mauser Madison 75 dated 6/5/2020; Alpet E3+ (hand sanitizer) dated March 2017; v2; Dart Degreaser dated 11/15/2017; Component FT-103 (Quat Powder) dated 2/3/2016; Chlor-Clean dated 11/29/2018; Pro Clean Degreaser dated 12/11/2020 and Proclean Foam dated 8/24/2018. MINOR: During the audit of the Boiler area located on the outside grounds, it was observed that 2 pails of a food-grade chemical (AEON 9000 FG-46 Food Grade Synthetic Lubricant) were observed to be stored in both of the chemical storage cabinets with the non-food grade chemicals.

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

RESPONSE: MINOR

EVIDENCE: During the audit of the Boiler area located on the outside grounds, it was observed that 2 pails of a food-grade chemical (AEON 9000 FG-46 Food Grade Synthetic Lubricant) were observed to be stored in both of the chemical storage cabinets with the non-food grade chemicals.

ROOT CAUSE: Food Grade chemical stored in nonfood grade cabinet: Maintenance tech placed in the wrong place accidently. This was a discontinued chemical that had been stored in non food grade cabinet and was an oversight from Maintenance.

CORRECTIVE ACTION: Food Grade chemical was discarded. A retraining was performed with all Maintenance department to make sure they are storing food grade and non food grade chemicals separately.

training for food grade chemicals.pdf

VERIFICATION OF CLOSEOUT: The auditor reviewed the Training document. This submission meets the criteria of the SQF code element 11.6.4.2.

COMPLETION DATE: 11/11/2022 **CLOSEOUT DATE:** 11/13/2022

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** Chinmay Naphade
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** cnaphade@chairmansfoods.com
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Wayne J. Arrighi: SQF Lead Auditor, Chinmay Naphade: FSQA Manager, Melinda Hall: Plant Manager, Jessica Galloway: HR Manager, Lenny Crookham: Maintenance Manager, Thomas Cannon: Plant Controller, Brett Cooper: Production Manager, Matthew Sutton: Shipping/Receiving Manager and Cesar Acevedo: FSQA Director.
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** The site is located in a commercial area with a residential area nearby. There are no structures or business entities nearby that pose any food safety or pest concerns. The site is 78,000 sq. ft. on 9 acres of land and the processing area is ~ 40,000 sq. ft. with processing, cold storage for the raw materials and finished products and shipping/receiving areas. There are ~ 120 employees (Production, Packaging, QA, Sanitation + Admin.) with employee parking on the side and administration, USDA and visitor parking located in front of the site. There are 3 Production shifts with a Sanitation shift performed on Sundays. The products within the scope of this audit that are processed onsite meet the SQF standards for FSC 20 - Recipe Meals Manufacture: Beef and Macaroni, Boiled Rice, Gumbo, Gravy, Macaroni and Cheese, Potato Based Products, Alfredo Sauce, Seasoned Vegetables (Leafy Greens, Beans, Creamed Corn, Okra and Tomato). The site is registered with the FDA and the USDA (# 27228A) with an onsite office area for the USDA personnel.

Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Wayne J. Arrighi: SQF Lead Auditor, Chinmay Naphade: FSQA Manager, Melinda Hall: Plant Manager, Jessica Galloway: HR Manager, Thomas Cannon: Plant Controller, Brett Cooper: Production Manager, Matthew Sutton: Shipping/Receiving Manager and Cesar Acevedo: FSQA Director.
Auditor Recommendation	Auditor Recommendation **RESPONSE:** Maintain Certification
2.1.1	**Management Responsibility (Mandatory)** There is a Food Safety Policy Statement dated 6/23/2022 which includes the requirement to review food safety + quality objectives, employee training and continuous improvement and the development. The corporate policy is in English and Spanish, signed by Melinda Hall (Plant Manager) and posted at the employee breakroom. Pre-requisite programs are in place and address elements. The client processes packaged products within the scope of this audit: FSC 20 - Recipe Meals Manufacture: Beef and Macaroni, Boiled Rice, Gumbo, Gravy, Macaroni and Cheese, Potato Based Products, Alfredo Sauce, Seasoned Vegetables (Leafy Greens, Beans, Creamed Corn, Okra and Tomato). There is an organizational chart dated 6/24/2022 which is current. The primary SQF Practitioner is the FSQA Manager (Chinmay Naphade). The designated back-up SQF practitioner is the Plant Manager (Melinda Hall). Both are PCQI trained. The primary SQF practitioner is certified as the company's PCQI (FSPCA certificate dated 12/27/2010) and the Plant Manager is also certified PCQI (FSPCA certificate dated 9/16/2016). HACCP certificates are current and dated 4/14-16/2015 for the primary and 12/27/2010 for the substitute practitioner. Both SQF practitioners are full time employees. The senior management supported the documented procedures, training, policy improvements and capital improvements to ensure the food safety practices were adopted and maintained. No blackout periods exist.
2.1.1.1	Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii.Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel. **RESPONSE:** COMPLIANT
2.1.1.2	Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work. **RESPONSE:** COMPLIANT
2.1.1.3	The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives. **RESPONSE:** COMPLIANT
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
2.1.1.5	The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification **RESPONSE:** COMPLIANT

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
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
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
2.1.2	**Management Review (Mandatory)** The facility complies with this SQF code element requirement 2.1.2. Monthly management meetings are conducted. The system is reviewed on a continual basis during these monthly meetings as well as reviewed annually. The site uses an online system to perform the monthly management meetings. The auditor reviewed the individual monthly management meetings dated 1/4/2022; 3/9/2022; 6/2/2022; and 9/7/2022). Client keeps records on file. Auditor reviewed the Management Review of the SQF System dated 7/30/2022 with senior management sign-off. Validation of all record changes are documented on the document register. All records of SQF system, changes, and validations are kept for 3 years.
2.1.2.1	The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained. **RESPONSE:** COMPLIANT
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
2.1.3	**Complaint Management (Mandatory)** The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities are documented in Handling Customer Complaints. Complaints will come from customers to the client's emails and phone calls; all logged into an Quality Concern Form and entered into the Customer Complaint Log and maintained by FSQA Manager. The FSQA Manager is the responsible person and determines who needs to be involved and performs the Root Cause Analysis. All potential food safety risk complaints are investigated by the FSQA Manager and sometimes the Plant Manager. All complaints are responded to within 24 hours. Complaints are discussed during Monthly SQF meetings. The auditor reviewed customer complaint log for 2022: Sixteen total complaints at this time, six foreign material complaints, one complaint for mold; 1 complaint for leakers, 7 complaints for agricultural foreign objects and 2 complaints for quality. The auditor reviewed the foreign object related complaint dated 8/1/2022 regarding a foreign material (stem) in a Publix Green Beans Boil in Bag that chipped the customer's tooth. The foreign material was submitted to the site but no lot code or response to the site's questions were provided. The foreign object is an "agricultural debris" that is inherently indigenous to the product. The investigation discovered the stem was not detected at the vendor inspection or at the site. The corrective action was retraining of the applicable employees on 8/1/2022. The validity of the assertion made by the customer regarding a "chipped" tooth could not be verified since there was no further response to the attempted contacts from the site's Customer Service.
2.1.3.1	The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented. **RESPONSE:** COMPLIANT

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
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
2.2.1	**Food Safety Management System (Mandatory)** The Food Safety Management System is in a binder and electronicnically maintained. It summarizes the organization's food safety policies and methods to meet the requirements of the current SQF standard (version 9.0). The food safety policy and organizational chart is current with the scope and listing of the products of interest (located in the food safety plan). Products listed are Recipe Meals Manufacture: Beef and Macaroni, Boiled Rice, Gumbo, Gravy, Macaroni and Cheese, Potato Based Products, Alfredo Sauce, Seasoned Vegetables (Leafy Greens, Beans, Creamed Corn, Okra and Tomato). Procedures to validate justifiable changes to the food safety plan are present. As stated in the HACCP review, no plan revisions have occurred since last audit. The requirement to notify the CB and SQFI in the case of a food safety regulatory is in the document.
2.2.1.1	The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. A summary of the organization’s food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System. **RESPONSE:** COMPLIANT
2.2.1.2	Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented. **RESPONSE:** COMPLIANT
2.2.2	**Document Control (Mandatory)** All documents are controlled with Document #'s and dates. All docs are stored on the client's secured company shared drive. All employees have access to PDF docs (Read Only). A electronic document register exist on the secured company shared drive and available to employees (Read Only).
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
2.2.3	**Records (Mandatory)** All records are recorded manually (hardcopy) and are accessible to authorized personnel. The auditor reviewed the Food Allergen Label Verification Listing records, the CCP related production paperwork and the Quality Control Sensory Evaluation Form (CQP1) for the first week of September 2021; second week of January 2022; third week of April 2022 and fourth week of September 2022 Records are stored securely and available upon request. All were compliant with management verification.
2.2.3.1	The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented. **RESPONSE:** COMPLIANT
2.2.3.2	All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed. **RESPONSE:** COMPLIANT

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
2.3.1	**Specification, Formulation and Realization** The New Product and Label Approval Procedure states the methods + responsibility for product realization. All product development is Sales and Customer driven and performed to meet customer specifications. Little product development is performed onsite (usually packaging design or labels). Validation is performed via site trials, complaint history and product testing onsite. Customers communicate the shelf-life information (expiration dates) and shelf-life studies are performed to substantiate. Shelf life studies are performed regarding food safety and quality attributes offsite using samples from actual production runs. All lots of submitted finished goods are tested for microbiological and pathogenic organisms offsite bi-weekly. All product realization records are stored onsite on the secured company shared drive. The auditor reviewed the COA's (Order # 292206418) dated 8/8/2022 for the shelf-life study of a assortment of approved finished products (BDK Collards dated 7/1/2021, BDK Whole Baby Carrots dated 6/243/2021, BDK Brown Gravy dated 7/10/2021, CF Creamy Mac dated 6/21/2021, PFSCH SSND Corn dated 7/13/201, etc.) after 1 year. Besides the microbiological testing results, sensory evaluation were reported (i.e. cheesy/smokey flavor; texture, etc.)
2.3.1.1	The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented. **RESPONSE:** COMPLIANT
2.3.1.2	New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements. **RESPONSE:** COMPLIANT
2.3.1.3	A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety. **RESPONSE:** COMPLIANT
2.3.1.4	Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment. **RESPONSE:** COMPLIANT
2.3.1.5	The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination. **RESPONSE:** COMPLIANT
2.3.1.6	Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained. **RESPONSE:** COMPLIANT

2.3.2	**Specifications (Raw Material, Packaging, Finished Product and Services)** The auditor reviewed Incoming Goods and Services SOP and the New Product and Label Approval Procedure. All raw material + packaging specifications are documented + kept current on the company's secured shared drive. Responsibility is of the R&D, Purchasing and Marketing personnel for approving specifications; the QA and R&D personnel for approving labels and the FSQA Manager for maintaining files to be current. Records of raw and packaging materials and approved suppliers are maintained on the company's secured shared drive. Suppliers in emergency situations will be required to provide the same documentation as approved suppliers to assure adherence to specifications and require senior management knowledge + approval. No receipts from non-approved suppliers were observed. Many ingredients + packaging are validated via documentation (COA's, COC's, LOG's, etc.) with others submitted for microbiological analysis. All suppliers are monitored and re-assessed annually. Finished Product labels are verified for regulatory compliance by the onsite QA personnel (FSQA Manager). A register of approved suppliers is maintained electronically + kept current on the company's secured shared drive. The site's QA personnel check all incoming labels for accuracy + line operators for allergen accuracy prior to Filling. All raw material, packaging and labels are maintained current + kept current on the company's secured shared drive. The auditor reviewed the List of Raw Materials, List of Packaging of all raw ingredients and packaging items and the List of Finished Products. All raw, packaging and label specifications are maintained current + kept current on the company's secured shared drive. The auditor reviewed raw ingredient specification for Half & Half, 2,000 lb. tote (Item # 04-05) dated 3/30/2018; v3 and the COA dated 8/19/2022 for the Chicken Base; Item # 900239 (Lot # E22081920P) and the Continuing Product Guarantee dated 8/16/2022 for the primary packaging : ProAmpac APEX 9D38 VF2 film (Item # 980410) used for the all products processed and packaged onsite. The film meets the FDA's Indirect Additive Regulations of 1958. The auditor reviewed the finished product specification for COSTCO Alfredo RF Sauce (Item # 34001) dated 9/13/2022. The auditor reviewed the Specification for Contract Services SOP dated 4/9/2022 and Contract Services Register on file.
2.3.2.1	The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented. **RESPONSE:** COMPLIANT
2.3.2.2	Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current. **RESPONSE:** COMPLIANT
2.3.2.3	All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known. **RESPONSE:** COMPLIANT
2.3.2.4	Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. **RESPONSE:** COMPLIANT
2.3.2.5	Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season). **RESPONSE:** COMPLIANT
2.3.2.6	Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained. **RESPONSE:** COMPLIANT
2.3.2.7	Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel. **RESPONSE:** COMPLIANT
2.3.2.8	Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel. **RESPONSE:** COMPLIANT

2.3.2.9	Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions. **RESPONSE:** COMPLIANT
2.3.2.10	Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current. **RESPONSE:** COMPLIANT

2.3.3 Contract Manufacturers

Contract manufacturers are not used.

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

2.3.4 Approved Supplier Program (Mandatory)

The auditor reviewed Raw Material and Packaging Approval Procedure; the Supplier Approval procedure and the Company Approval Procedure. All raw material + packaging specifications are documented + kept current on the company's secured shared drive. Responsibility is of the QA department personnel (FSQA Manager) for reviewing and approving specifications and maintaining the applicable files to be current. Records of raw and packaging materials and approved suppliers are maintained on the company's secured shared drive. Suppliers in emergency situations will be required to provide the same documentation as approved suppliers to assure adherence to specifications and require senior management knowledge + approval. No receipts from non-approved suppliers were observed. Many ingredients + packaging are validated via documentation (COA's, COC's, LOG's, etc.) with others submitted for microbiological analysis. All suppliers are monitored and re-assessed annually. Finished Product labels are verified for regulatory compliance by onsite QA personnel. A register of approved suppliers is maintained electronically + kept current on the company's secured shared drive. The site personnel check all incoming labels for accuracy + line operators for allergen accuracy prior to Filling. All raw material, packaging and labels are maintained current + kept current on the company's secured shared drive. The auditor reviewed the Approved Supplier Register (revised August 14, 2022) listing of the suppliers all raw ingredients and packaging items. All raw, packaging and label specifications are maintained current + kept current on the company's secured shared drive. The site evaluates the Approved Supplier's performance and calculates a "Vendor Score". The auditor reviewed the Approved Supplier Performance 2022 table. It is robust and comprehensive.

2.3.4.1	The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered. **RESPONSE:** COMPLIANT

2.3.4.2	The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status. **RESPONSE:** COMPLIANT
2.3.4.3	Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site. **RESPONSE:** COMPLIANT
2.3.4.4	The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use. **RESPONSE:** COMPLIANT
2.3.4.5	Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers. **RESPONSE:** COMPLIANT
2.3.4.6	Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. **RESPONSE:** COMPLIANT
2.4.1	**Food Legislation (Mandatory)** The responsibility is of the FSQA Manager for keeping current on all food regulations. Local management were able to name the principles to contact in case of as regulatory event. The requirement for notification for SQFI + the certification body within 24 hour is stated in the Emergency Contact List. The email address for SQFI is listed in the list as well. Auditor reviewed the FDA Food Facility Registration printout; last updated 11/10/2020; expiration date 12/31/2022 and a Valid registration status and the United States Department of Agriculture; Establishment # 27228A; License # 20180302; Anniversary Date 1/8/2021.
2.4.1.1	The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice. **RESPONSE:** COMPLIANT
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
2.4.1.3	SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com. **RESPONSE:** COMPLIANT
2.4.2	**Good Manufacturing Practices (Mandatory)** The auditor reviewed the Good Manufacturing Practice Policy. General aspect of the GMP policy are posted on the TV located in the employee breakroom and on the Visitor GMP document. The policy addresses how to control and maintain food safety for the scopes of certification (FSC 20).
2.4.2.1	The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised. **RESPONSE:** COMPLIANT

2.4.2.2	The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented. **RESPONSE:** COMPLIANT
2.4.3	**Food Safety Plan (Mandatory)** The site has a SQF Food Safety Plan maintained on file. The food safety plan has been developed following the 12-step HACCP method and has been effectively implemented. The auditor reviewed the food safety plan. ALL FINISHED PRODUCTS ARE HEAT TREATED BUT NOT RTE: LOW RISK. Procedure is FSMA compliant with HACCP Team having the required PCQI training. The HACCP team is comprised of the FSQA Manager - Chinmay Naphade, Plant Manager - Melinda Hall, Production Manager - Brett Cooper, Maintenance Manager - Lenny Crookham, QA Supervisor - Juliette Denmark and QA Supervisor - Shemika Jones. There are 5 HACCP Plans. Three CCP's are identified in the Hazard Analysis for all 5 HACCP plans. FOR LINES # 1 + 3: FDA HACCP Plans # 1 +2 : Fully Cooked-Not Shelf Stable Vegetables, Casseroles, Sauce, Pasta & Soup Not Shelf Stable. CCP 1 = Cooking Temperature. The critical limit is > or = 158°F and is monitored continuously by the Manager or designee using a hand held thermometer. CCP 2 = Chilling. Frozen Products: The critical limit is < or = 40°F and the temperature of the product is monitored prior to the product entering the Spiral Freezer by the Manager or designee using a hand held digital probe thermometer. CCP 3 = Metal Detection. The critical limit is pass/fail using metal test pieces: Ferrous = 2.5mm; Non-Ferrous = 3.0mm and 316 Stainless Steel = 4.5mm and is monitored by the Manager or designee for every bagged passed through the metal detector. FOR LINES # 1 + 3: FDA HACCP Plans # 3 + 4: Heat Treated Not Shelf Stable Vegetables, Casseroles, Sauce, Pasta, Pea Protein & Soup. CCP 2 = Chilling. Frozen Products: The critical limit is < or = 50°F and the temperature of the product is monitored prior to the product entering the Spiral Freezer by the Manager or designee using a hand held digital probe thermometer. CCP 3 = Metal Detection. The critical limit is pass/fail using metal test pieces: Ferrous = 2.5mm; Non-Ferrous = 3.0mm and 316 Stainless Steel = 4.5mm and is monitored by the Manager or designee for every bagged passed through the metal detector. FOR LINE # 1 USDA HACCP Plan # 5: Fully Cooked Not Shelf Stable Vegetables, Casseroles, Sauce, Pasta & Soup Not Shelf Stable. CCP 1 = Cooking Temperature. The critical limit is > or = 158°F and is monitored continuously by the Manager or designee using a hand held thermometer. CCP 2 = Chilling. Frozen Products: The critical limit is < or = 40°F and the temperature of the product is monitored prior to the product entering the Spiral Freezer by the Manager or designee using a hand held digital probe thermometer. CCP 3 = Metal Detection. The critical limit is pass/fail using metal test pieces: Ferrous = 2.5mm; Non-Ferrous = 3.0mm and 316 Stainless Steel = 4.5mm and is monitored by the Manager or designee for every bagged passed through the metal detector. There is a Preventive Control Plan which mirror 4 of the FDA regulated HACCP plans: There is 1 PC: PC 1 = Food Allergen Preventive Controls at the Receiving of Packaging Materials and after the packed product passes through metal detection. It is monitored by the Receiving crew at the Receiving step and in the Packaging area. Radiological hazards are part of the FDA compliant HARPC Plan's Hazard Analysis for each product. The HACCP plan has been verified by the HACCP Team on 3/9/2022. The Preventive Control (HARPC plan) has been verified by the HACCP Team on 7/23/2022. The products are shipped domestically and meet the applicable regulatory requirements.
2.4.3.1	A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification. **RESPONSE:** COMPLIANT
2.4.3.2	The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team. **RESPONSE:** COMPLIANT
2.4.3.3	The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs. **RESPONSE:** COMPLIANT
2.4.3.4	Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions. **RESPONSE:** COMPLIANT
2.4.3.5	The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product. **RESPONSE:** COMPLIANT

2.4.3.6	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation. **RESPONSE:** COMPLIANT
2.4.3.7	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs. **RESPONSE:** COMPLIANT
2.4.3.8	The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT
2.4.3.9	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.10	Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT
2.4.3.11	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT
2.4.3.12	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT
2.4.3.13	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT
2.4.3.14	The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur. **RESPONSE:** COMPLIANT
2.4.3.15	Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5). **RESPONSE:** COMPLIANT
2.4.3.16	Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used. **RESPONSE:** COMPLIANT

2.4.3.17	Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements. **RESPONSE:** COMPLIANT
2.4.4	**Product Sampling, Inspection and Analysis** The Product Sampling, Analysis and Inspection SOP was reviewed. There is a QC lab adjacent to the Processing areas and suitable for raw/finished product/packaging analysis. Finished product analysis: Oakion pH meter, Atago Pocket Salt Meter, Milwaukee MAA871 Refractometer, 1 TA.XT plus C Texture + Viscosity Analyzer using Export Connect Software), Texture Analyzer, Chroma Meter CR 410 (color), 2 Drywell 3101 reference Heating Blocks and 1 Thermoworks Digital Reference Thermometer. This facility generates no hazardous lab waste requiring specific actions to be taken. Proper signage identifying the laboratory area as a restricted area is displayed. The site performs no initial testing of raws/packaging or inprocess testing for the products processed onsite. Finished product testing is performed regarding salt %, pH, color, texture/viscosity. The finished products produced onsite are tested randomly every month for microbiological testing. Finished Product physical attribute testing: pH and salt %. Finished products are also evaluated for their quality attributes (CQP-1) such as drain weight, viscosity and bag weights, as well as sensory compliance. The auditor reviewed the Quality Control Sensory Evaluation Forms dated 10/4/2021, 1/11/2022 and 4/23/2022. The site uses contracted certified laboratory services meeting ISO/IEC 17025:2017 international standards (EMSL Analytical Inc.; expiration date: 2/1/2023). The auditor reviewed the COA's for the random monthly microbiological analysis (Order # 292110695 dated 11/17/2021; Order # 292200903 dated 2/9/2022; Order # 2922302915 dated 4/13/2022 and Order # 292207717 dated 9/14/2022). All were compliant. There are no testing regarding food safety performed onsite. Therefore, there is no need to perform proficiency testing regarding food safety. No hazardous laboratory waste generated onsite.
2.4.4.1	The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation. **RESPONSE:** COMPLIANT
2.4.4.2	Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11). **RESPONSE:** COMPLIANT
2.4.4.3	On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel. **RESPONSE:** COMPLIANT
2.4.4.4	Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas. **RESPONSE:** COMPLIANT
2.4.4.5	Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelflife of the product. **RESPONSE:** COMPLIANT
2.4.4.6	Records of all inspections and analyses shall be maintained. **RESPONSE:** COMPLIANT

2.4.5 Non-conforming Materials and Product

The auditor reviewed the Non-Conforming Product and Holding Procedures. It outlines the methods and responsibilities for handling non-conforming products. Any products that do not have the required paperwork and/or pass the QC tests (if necessary) are NOT permitted into the facility. Responsible person is the FSQA Manager. All non-compliant product/raws/packaging are labeled with a QA Hold tag. The site uses QA Hold Logs to log all noncompliances. The auditor reviewed the QA Hold Log for 2022 and the Hold for a COSTCO Alfredo Sauce (Item # 34001; Lot # 36875-05/06) dated 6/4/2022 for 222 cases due to a foreign material (3 pieces of a shear pump gasket). Two pieces were identified by the metal detector and 1 piece was still missing. There were 2 pieces of the shear pumps gasket found missing after the run. Product was placed on HOLD and then rerun through the metal detector where the third piece of gasket was detected. The balance of the batch could then be released. The auditor reviewed the CAPA (CAPA # 0604022) dated 6/4/2022 where the root cause was determined to be an employee not installing the pump cover correctly. The employee was given a written warning.

2.4.5.1 The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.6 Product Rework

The auditor reviewed the Chairmans Foods Rework Program. It details the methods and responsibilities regarding rework. Responsible personnel are the FSQA Manager and the Plant Manager or designee. All reworked material are tested for customer/regulatory/quality compliance using the same-to-same policy. Procedures addresses the tracking of all rework to be used in production. The auditor reviewed the Noncompliance Log for COSTCO Alfredo Sauce (Item # 34001; Lot # 36875-05/06) dated 6/4/2022 for 222 cases due to a foreign material (3 pieces of a shear pump gasket). Two pieces were identified by the metal detector and 1 piece was still missing. There were 2 pieces of the shear pumps gasket found missing after the run.

2.4.6.1 The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

2.4.7 Product Release (Mandatory)

The auditor reviewed Product Release SOP. The FSQA Manager and onsite QA personnel are responsible. Incoming raws and packaging documentation (COA's, COC's) are required and reviewed. If they pass the QA testing evaluations and label verification, warehouse personnel label (Pallet tag) with the vendor's lot # and place into the warehouse. Verification of inprocess and post processing CCP's are performed and recorded on the applicable HACCP related paperwork. The FSQA Manager is the only authorized people to release product that is on Hold status. Once the product's applicable testing is completed, the QA results are entered into the site's inventory control system (Macola) and the product can be released (shipped) according toe customer's ship date. Now those products on Hold can be shipped. If still nonconforming results are observed, additional sampling and testing is performed. If product passes, released for shipment. If fails testing again, depending on type of nonconformance (food safety, quality), product may be reworked or disposed. Records are entered in the Hold log.

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

RESPONSE: COMPLIANT

2.4.7.2	Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use. **RESPONSE:** COMPLIANT
2.4.7.3	In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed. **RESPONSE:** COMPLIANT
2.4.8	**Environmental Monitoring** The auditor reviewed the Sampling Program. The FSQA Manager performs the onsite risk assessment and the program is reviewed annually. There is a swabbing schedule outlined in the EMP. Weekly swabbing of ~ 26 locations is performed by the QA personnel based upon the predetermined zone locations (1, 2, 3 + 4) and FDA. The food contact surfaces are swabbed for APC and the non-food contact surfaces are swabbed for Listeria spp. The site sends all its environmental swab testing to a contracted certified offsite micro lab. The site uses contracted certified laboratory services meeting ISO/IEC 17025:2017 international standards (EMSL Analytical Inc.; expiration date: 2/1/2023). The auditor reviewed COA's of the lab's testing results dated 2/3/2022; 4/7/2022 and 8/11/2022 for many locations throughout the processing site.
2.4.8.1	A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented. **RESPONSE:** COMPLIANT
2.4.8.2	An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results. **RESPONSE:** COMPLIANT
2.4.8.3	Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed. **RESPONSE:** COMPLIANT
2.5.1	**Validation and Effectiveness (Mandatory)** Validation/Verification of Monitoring Activities SOP details the SQF practitioner is responsible for documenting and implementing the methods and criteria for verification + validation. Records are maintained by the SQF Practitioner. The SQF Food Safety systems are validated annually. The auditor reviewed 2022 Champs Mac and Cheese Drain Weights Data dated records dated 1/28/2022 to 4/1/2022; COSTCO Alfredo Viscosity - Mean Force dated from August and September 2022 and 2022 Stuffed Pepper Filling pH and Salt Data dated from 2/8/2022 to 6/2/2022 and the Allergen Validation for Cleaning Methods dated 7/12/2022.
2.5.1.1	The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained. **RESPONSE:** COMPLIANT
2.5.2	**Verification Activities (Mandatory)** The Verification of Monitoring Activities SOP details the SQF practitioner is responsible for documenting and implementing the methods and criteria for verification + validation. There is a Verification/Validation Schedule on file dated 8/20/2022. The frequency is daily for each product (monitored by control Processing charts). The auditor reviewed the HACCP Production Data Sheet - Line 3 (FCNSS USDA & FDA) regarding the retort production of finished products dated 10/17/2021, 1/10/2022 and 4/21/2022

2.5.2.1	The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record. **RESPONSE:** COMPLIANT
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
2.5.3	**Corrective and Preventative Action (Mandatory)** The Corrective & Preventive Action Procedures details root cause analysis and resolution of non-conforming products and the responsibility is of the FSQA Manager. The Corrective Actions are detailed in the CAPA forms maintained by the FSQA Manager. The auditor reviewed the QA Hold Log for 2022 and the Hold for a COSTCO Alfredo Sauce (Item # 34001; Lot # 36875-05/06) dated 6/4/2022 for 222 cases due to a foreign material (3 pieces of a shear pump gasket). Two pieces were identified by the metal detector and 1 piece was still missing. There were 2 pieces of the shear pumps gasket found missing after the run. Product was placed on HOLD and then rerun through the metal detector where the third piece of gasket was detected. The balance of the batch could then be released. The auditor reviewed the CAPA (CAPA # 0604022) dated 6/4/2022 where the root cause was determined to be an employee not installing the pump cover.
2.5.3.1	The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate. **RESPONSE:** COMPLIANT
2.5.3.2	Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained. **RESPONSE:** COMPLIANT
2.5.4	**Internal Audits and Inspections (Mandatory)** The Internal Audit Procedures addresses responsibility and methods of the internal audit process. The internal audits are conducted effectively verify the SQF system and any findings are addressed with corrective actions. The FSQA and Plant Managers has received formal internal audit training (Plant Manager Training Certificate dated 11/6/2021) and conduct both the internal system and GMP audits. The auditor reviewed the training form dated 4/2/2022 for the annual internal audit refresher training for several members of management who participate in the facility GMP audits. Internal GMP audits are conducted monthly. The auditor reviewed the Monthly GMP Audits performed dated 9/1/2022. The nonconformances related to this audit were listed and CAR's were performed.
2.5.4.1	The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions. **RESPONSE:** COMPLIANT
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
2.5.4.3	Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken. **RESPONSE:** COMPLIANT

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

2.6.1 Product Identification (Mandatory)

The Product Identification SOP addresses methods and responsibility for product identification at all stages of the process. The Shipping and Receiving, Production Processing and QA personnel have specific responsibilities for the program. Case/package labels are generated by the site's inventory control system (Macola) are applied to all incoming materials and all finished products with operators performing a label verification at each label changeover (reviewing allergen statement). Product start up and changeover procedures during packing are documented and implemented to ensure that the correct product is in the correct package and with the correct label. The changeover is inspected and approved by an authorized employee (Production and QA). The changeover will be inspected to ensure that all labels from the previous batch were removed from the line. For all raw materials and packaging received, the site's inventory control system generates a unique lot number. For finished products, code dates are assigned as per customer specifications. If there is no specified customer code requirement, the site uses a corporate driven identification standard. An example of a finished product Item 3; Use By Date; Lot # and Bag #. Records of product identification are maintained online and on the recorded production records. The auditor reviewed product identification records on line during facility audit and reviewed records from 2022. The auditor observed online personnel using correct format to comply with customer and SQF code requirements.

2.6.1.1	The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements. **RESPONSE:** COMPLIANT
2.6.1.2	Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained. **RESPONSE:** COMPLIANT

2.6.2 Product Trace (Mandatory)

The Traceability Plan outlines responsibilities and methods for traceability throughout the process, as well as for recalls and withdrawals (one up + one back). The Macola System Controller is ultimately responsible for product trace program. Raw materials and primary packaging are traced using the manufacture lot number and finished products are assigned a date lot number form the Macola inventory management system. A Traceability exercise (one back/one forward) was conducted during the audit for the following finished product selected by the auditor: COSTCO Alfredo Sauce; Lot # B38436, Item # 34001; DOM 10/14/2022 and Use by Date: 12/28/2022. The Inventory Controller Scheduler used the Macola system for tracing this product. Produced 2,741 cases; Shipped 13 cases; Inventory 2,728 cases. 100% of product accounted. Primary Packaging: Film 510 mm, 4.0 ml.; Item # 980410; Lot# 4611; Received 534,313,18 meters; Used 364,001.52 meters; Inventory 43,356.16 meters and Dumped 126,955.16 meters. Raw Materials: Half & Half Milk; Item 900222; Lot #'s 1) 101622. Received 28,215 lb.; Used 28,215 lb.; In Inventory: 0 lb. and 2) 101822. Received 39,655 lb.; Used 39,655 lb.; In Inventory: 0 lb. and Butter: Item # 900112; Lot #'s 1) 56314. Received 41,887.4 lb.; Used 41,909 lb. (includes 21.665 lb. overage.; In Inventory: 0 lb. and 2) 56390. Received 41,887 lb.; Used 21,822.12 lb.; In Inventory: 20,065.28 lb. 100% of raw materials were accounted. The trace exercise took 1 hour 21 minutes to perform.

2.6.2.1	The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained. **RESPONSE:** COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

The Recall Plan outlines responsibilities and methods for traceability throughout the process as well as for recalls and withdrawals (one up + one back). Responsible people are the FSQA Manager at the corporate level and the Plant Manager at the site level. A Recall Committee consist of the President, Accountant, MRP, Plant Manager, Warehouse Manager, Production Manager and Inventory Control. Trace exercises (Mock recall) are conducted annually. A Mock Recall exercise (one back/one forward) was conducted 7/13/2022 for the Finished Product used onsite: Old South Gumbo; Lot # B37048, Item # 30064. The site uses Macola software system for performing this exercise. Produced 619 cases; Shipped 619 cases.; 0 cases in Inventory. 100% accounted for. Primary Package: Film 510; Item # 980115; Lot # 3736. Received: 317378 meters; Used: 22,35289 meters; Inventory: 613473 meters. 100% accounted for. Raw Material: Bell Pepper (Item # 900094; Lot # 4905). Received 10,000 lb.; Used 800 lb.; Inventory 9200 lb. The mock recall exercise took 1 hour 45 minutes to perform.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.4 Crisis Management Planning

The auditor reviewed the Business Continuity and Disaster Preparedness Plan. The Crisis Management team will oversee the crisis. The team designations are stated in the policy and the names of those responsible are listed in the plan: Plant Manager - Melinda Hall, Production Manager - Brad Cooper, FSQA Manager - Chinmay Naphade, Thomas Cannon - Comptroller, Robin Carr - Regulatory, Maurilio Martinez - Scheduling and Mathew Sutton - Warehouse Manager. The Plant Manager - Melinda Hall is the Primary Crisis Manager and Primary Emergency Contact. She is responsible for decision-making and initiating actions concerning the plan. If he is not available, the VP of Sales - Dan Quirk is the Secondary Crisis Manager and Secondary Emergency Contact. Chuck Ford of Page, Scranton, Sprouse, Tucker & Ford is the source for legal advice. The Plant Manager will be responsible for communicating with authorities, external organizations, and the media. The Plant Manager will also be responsible for internal communications. In the event of her absence the VP of Sales will have these responsibilities. The plan was reviewed on 6/17/2022 and tested on 6/17/2022. A scenario was an ammonia release onsite. The test was verified with management participation. Records are available upon request.

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

RESPONSE: COMPLIANT

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
2.7.1	**Food Defense Plan (Mandatory)** The auditor reviewed the Food Defense Plan outlines methods and responsibilities for food defense. The Procedures address requirements of the SQF code 2.7.1. The plant has access control, locked external doors for restricted access to areas of facility; passwords + firewalls used for computer systems with a disaster recovery system. The Crisis Management team acts as the Food Defense Team and the designations are stated in the plan: Plant Manager - Melinda Hall, Production Manager - Brad Cooper, FSQA Manager - Chinmay Naphade, Thomas Cannon - Comptroller, Robin Carr - Regulatory, Maurilio Martinez - Scheduling and Mathew Sutton - Warehouse Manager. The auditor reviewed the Plant Manager's Certificate of Completion for Global Food Defense/Emergency Procedures dated 6/21/2017. Each member of the team have been trained on Food Defense during the Annual SQF training conducted 2/3/2022 to 9/30/2022. Raw material, packaging WIP, process inputs and finished product protections are in place. The Food Defense concerns are included in the monthly SQF Management Meetings. Facility performs an annual Food Defense Vulnerability Assessment to review + challenge the program. Auditor reviewed the Food Defense Vulnerability Assessment performed on 6/27/2022. When available, sealed trailers for incoming + outgoing shipments. Food Defense plan reviewed by Food Defense Team and challenged on 6/27/2022. The scenario was entry from several entrances by an unauthorized person. The person was stopped by an employee and directed to the Receptionist lobby. Auditor reviewed the FDA Food Facility Registration printout; last updated 11/10/2020; expiration date 12/31/2022.
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
2.7.1.2	A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors. **RESPONSE:** COMPLIANT
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
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
2.7.2	**Food Fraud (Mandatory)** The auditor reviewed Food Defense Plan outlines methods and responsibilities for food defense. The Procedures address requirements of the SQF code 2.7.1. The plant has access control, locked external doors for restricted access to areas of facility; passwords + firewalls used for computer systems with a disaster recovery system. The Crisis Management team acts as the Food Fraud Team and the designations are stated in the plan: Plant Manager - Melinda Hall, Production Manager - Brad Cooper, FSQA Manager - Chinmay Naphade, Thomas Cannon - Comptroller, Robin Carr - Regulatory, Maurilio Martinez - Scheduling and Mathew Sutton - Warehouse Manager. The Plant Manager is the Food Defense Coordinator. The auditor reviewed the Plant Manager's Certificate of Completion for Global Food Defense/Emergency Procedures dated 6/21/2017. Each member of the team have been trained on Food Defense during the Annual SQF training conducted 2/3/2022 to 9/30/2022. Raw material, packaging WIP, process inputs and finished product protections are in place. The Food Defense concerns are included in the monthly SQF Management Meetings. Facility performs an annual Food Fraud and Vulnerability Assessment to review + challenge the program. The auditor reviewed the Food Fraud Vulnerability Assessment performed on 7/4/20223 (in the plan). When available, sealed trailers for incoming + outgoing shipments. Food Fraud plan reviewed by Food Fraud Team 7/14/2021.

2.7.2.1	The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained. **RESPONSE:** COMPLIANT
2.7.2.2	A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials. **RESPONSE:** COMPLIANT
2.7.2.3	Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1). **RESPONSE:** COMPLIANT
2.7.2.4	The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained. **RESPONSE:** COMPLIANT
2.8.1	**Allergen Management (Mandatory)** The Allergen Program outlines the responsibility and methods for controlling allergens. The FSQA Manager is ultimately responsible for the allergen control program at this site. The FSQA Manager will train all employees on any allergen related policies applicable to their position. Full cleaning and sanitation is performed during startup / changeover or if required between production runs. The FSQA Manager performs the risk assessment for allergens. The auditor reviewed the Raw Ingredient Assessment dated 10/25/2021. There are four allergens in the plant and final products - Dairy, Egg, Wheat and Soy. There are no designated processing lines for allergen processing and use the same equipment for processing. Rely upon Sanitation verification practices (ATP swabbing) before production startup and allergen testing on the applicable equipment. All products and ingredients are fully traceable including allergens. All incoming raw ingredients are labelled at Receiving using a neon orange colored allergen tag. Allergen containing ingredients are segregated on their own pallet and stored in a designated allergen storage location in the Cooler. If individual allergens are to be stored vertically in the racks, they will be stored “like above like.” There is an Allergen Matrix Summary that is a guide on what the production/processing order should be followed. Allergen containing raw materials will not be stored above other types of allergens or non-allergens. The site tests for allergens using the Neogen 3D Reveal system. An annual allergen validation is performed to validate the site's sanitation program regarding allergen removal. The auditor reviewed the Annual Validation results dated 6/12/2022. All results were "negative" once the areas of interest were cleaned and tested for residual allergens.
2.8.1.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan, and vi. Management plans for control of the identified allergens. **RESPONSE:** COMPLIANT
2.8.1.2	Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens. **RESPONSE:** COMPLIANT
2.8.1.3	Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored. **RESPONSE:** COMPLIANT
2.8.1.4	Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible. **RESPONSE:** COMPLIANT

2.8.1.5	Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented. **RESPONSE:** COMPLIANT
2.8.1.6	Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact. **RESPONSE:** COMPLIANT
2.8.1.7	The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured. **RESPONSE:** COMPLIANT
2.8.1.8	The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used. **RESPONSE:** COMPLIANT
2.8.1.9	The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures. **RESPONSE:** COMPLIANT
2.8.1.10	Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable. **RESPONSE:** COMPLIANT
2.8.1.11	Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities. **RESPONSE:** COMPLIANT
2.9.1	**Training Requirements** The Employee Training Program addresses requirements of employee training. The site train their employees at new hire and refresher training. The responsible persons is the FSQA Manager. Competencies and methods are detailed in the training documentation. A Training matrix exist on the site's secured shared drive. SQF System/Food Safety topics are listed and noted when training is due + completed. Appropriate personnel are trained on their required areas of responsibility. The client uses training PowerPoints, videos and hardcopy documentation for general training and more specific topics. Appropriate personnel are trained regarding the food safety and quality requirements (CCP's, CQP's, HACCP, SQF/PCQI Training certificates).
2.9.1.1	The responsibility for establishing and implementing the training needs of the organization’s personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6). **RESPONSE:** COMPLIANT
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
2.9.2	**Training Program (Mandatory)** Employees are trained on required food safety criteria and personal safety. The FSQA Manager is responsible for the training and records required employee training. All training records are being stored in the FSQA Manager's office regarding employees involved in HACCP and CCP monitoring, GMP's, Allergen Management, Sampling and Analysis and Personal Hygiene. All training is conducted in English and Spanish by trained personnel using interpreters when necessary. Refresher training is performed annually for all employees and when a change and/or an addition occurs. The auditor reviewed the Training Skills Register for the site's employee SQF associated training. The auditor reviewed the training records regarding GMP's, HACCP, food safety and CCP's for those employees interviewed during the facility audit.

2.9.2.1	A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization. **RESPONSE:** COMPLIANT
2.9.2.2	Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff. **RESPONSE:** COMPLIANT
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
11.1.1	**Premises Location and Approval** The site is located in a commercial area with a residential area nearby. There are no structures or business entities nearby that pose any food safety or pest concerns. The site is 78,000 sq. ft. on 9 acres of land and the processing area is ~ 40,000 sq. ft. with processing, cold storage for the raw materials and finished products and shipping/receiving areas. There are ~ 120 employees (Production, Packaging, QA, Sanitation + Admin.) with employee parking on the side and administration, USDA and visitor parking located in front of the site. There are 3 Production shifts with a Sanitation shift performed on Sundays. The products within the scope of this audit that are processed onsite meet the SQF standards for FSC 20 - Recipe Meals Manufacture: Beef and Macaroni, Boiled Rice, Gumbo, Gravy, Macaroni and Cheese, Potato Based Products, Alfredo Sauce, Seasoned Vegetables (Leafy Greens, Beans, Creamed Corn, Okra and Tomato). The site is registered with the FDA and the USDA (# 27228A) with an onsite office area for the USDA personnel.
11.1.1.1	The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority. **RESPONSE:** COMPLIANT
11.1.2	**Building Materials** Floors are concrete, sealed in most of the processing areas and well maintained. All floors in the non-processing areas (Shipping/Receiving dock areas, product/packaging storage) are concrete and well maintained. Floor drains are located in appropriate processing areas and capable of accommodating a cleaning washdown. The site does not have a waste trap system. Walls, ceilings, partitions and doors are properly constructed of concrete, metal and metal insulated panels and are well maintained. The ceiling are well maintained and sealed. No water piping over production/packing lines. No windows in the Processing building. All dock bay doors are secured and pest proofed. Platform stairs are located in production areas (Cook Room) and does not represent a food safety threat.
11.1.2.1	Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place. **RESPONSE:** COMPLIANT
11.1.2.2	Drains shall be constructed and located so they can be easily cleaned and not present a hazard. **RESPONSE:** COMPLIANT

11.1.2.3	Waste trap system shall be located away from any food handling areas or entrances to the premises. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no waste trap systems onsite.
11.1.2.4	Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. **RESPONSE:** COMPLIANT
11.1.2.5	Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated. **RESPONSE:** COMPLIANT
11.1.2.6	Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated. **RESPONSE:** COMPLIANT
11.1.2.7	Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material. **RESPONSE:** COMPLIANT
11.1.2.8	Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities. **RESPONSE:** COMPLIANT
11.1.2.9	Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5). **RESPONSE:** COMPLIANT
11.1.3	**Lightings and Light Fittings** The site has LED lighting producing sufficient illumination for workers. All lighting bulbs are covered with shatterproof plastic tubing.
11.1.3.1	Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards. **RESPONSE:** COMPLIANT
11.1.3.2	Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program. **RESPONSE:** COMPLIANT
11.1.3.3	Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination. **RESPONSE:** COMPLIANT
11.1.4	**Inspection/ Quality Control Area** There is no online inspection areas onsite.

11.1.4.1	If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination. **RESPONSE:** NOT APPLICABLE
11.1.5	**Dust, Insect, and Pest Proofing** Doors are adequately sealed to protect against dust and pest contamination. Bait stations are located along the exterior perimeters only. All bay doors are electronically controlled and pest proofed (good seals) with external bumpers for trailers to seal against. External door (employee entrance) is sealed + secure. Electronic insect lighting are strategically located and operational. Rodent traps are located away from the processing areas and do not pose a risk to the products and are labeled and functional.
11.1.5.1	All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests. **RESPONSE:** COMPLIANT
11.1.5.2	External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas. **RESPONSE:** COMPLIANT
11.1.5.3	Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed. **RESPONSE:** COMPLIANT
11.1.6	**Ventilation** There was adequate ventilation throughout the facility during the audit. The site has a program for cleaning of ventilation systems. There are two cooking kettles in the Cook Room and 3 retorts in the Fill Room. There was no condensation observed during the facility audit. The steam generated form the kettles is removed via the ceiling mounted exhaust vent. A contracted service provider maintains the filter maintenance on the main HVAC units.
11.1.6.1	Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination. **RESPONSE:** COMPLIANT
11.1.6.2	All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions. **RESPONSE:** COMPLIANT
11.1.6.3	Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s). **RESPONSE:** COMPLIANT
11.1.6.4	Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean. **RESPONSE:** COMPLIANT

11.1.7	**Equipment and Utensils** Equipment are designed with impervious material and ease of cleaning. All overflows are discharged directly to the drain. All utensils are colored coded and designed for the required task. A contracted laundering service supplies the uniform/protective clothing to the company. Racks for clothing are located in employee change- rooms. All cleaned equipment + utensils are cleaned daily or as needed and stored to prevent microbiological contamination. Identification of the utensils is performed by them being color coded. For cleaning: White, Yellow and S.S.- Edible; Red + Blue - Inedible; Green - Sanitizer; Grey - Trash; Blue Scrub Brush- Floors and Black Scrub Brush - Drains. The auditor reviewed the vendor literature for the utensils that come into contact with food contact surfaces: Sparta Tank & Kettle Brush(FDA Compliant) - White; Item # 6387 20761 and Scoop Stainless Steel, 32 oz; Model # 3013 4003. Both were either NSF certified or meet FDA standards for use with foods. MINOR: During the audit of the 2 onsite storage freezers and the Filling Room, the following was observed: 1) an excessive amount of ice buildup on the ceiling mounted cooling units requiring pallets of raw materials and finished product to be removed from storage directly below them. 2) the door to the Finished Product storage freezer is operational but is damaged resulting in it not capable of properly sealing the entrance to the freezer (a sizable open space exist when closed). 3) a protective cover to a ceiling mounted emergency light has been removed resulting in ice buildup on the exposed electrical wiring and 4) an open ended wrench with a peeling ID label was lying near the Wolf Bagger.
11.1.7.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented. **RESPONSE:** COMPLIANT

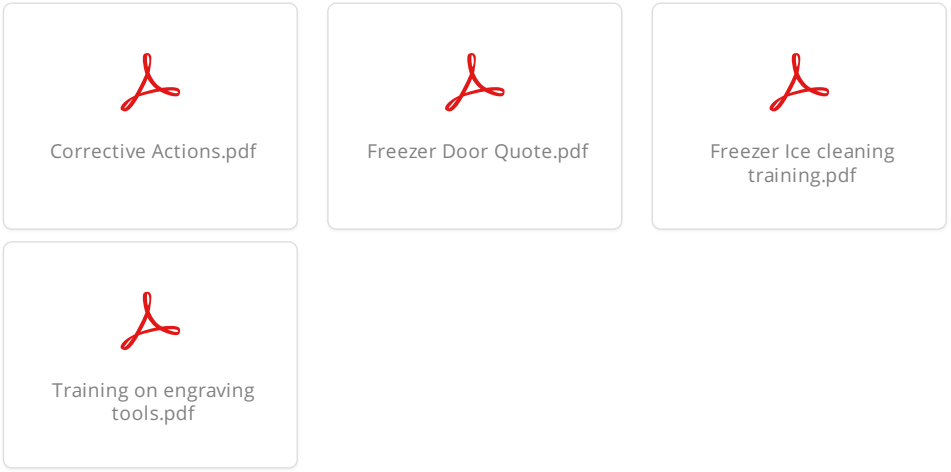
11.1.7.2 Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products.

RESPONSE: MINOR

EVIDENCE: During the audit of the 2 onsite storage freezers and the Filling Room, the following was observed: 1) an excessive amount of ice buildup on the ceiling mounted cooling units requiring pallets of raw materials and finished product to be removed from storage directly below them. 2) the door to the Finished Product storage freezer is operational but is damaged resulting in it not capable of properly sealing the entrance to the freezer (a sizable open space exist when closed). 3) a protective cover to a ceiling mounted emergency light has been removed resulting in ice buildup on the exposed electrical wiring and 4) an open ended wrench with a peeling ID label was lying near the Wolf Bagger.

ROOT CAUSE: Ice on the ceiling: Inadequate cleaning frequency causing ice buildup above the cooling units. Finished goods Freezer Door: Damaged due to forklift impact. This door is capital expenditure and quote is submitted to be replaced. Missing Protective cover on emergency light: Oversight from Management Wrench had a peeling ID label: Oversight from Production Supervisor. Tools are always engraved. Corrective Actions: Ice on the ceiling: Shipping Manager conducted a training with his team to ensure that the freezer ceiling will be scrapped off ice once a week. Finished Goods Freezer Door: Maintenance straightened the door to make sure that there is no gap when the door is closed. There is a functioning air curtain that is in place to ensure that there is no pest intrusion or loss of cooling. Also, there are plastic curtains behind this door to make sure that there is no pest intrusion or loss of cooling. A quote had been submitted to fix this door. Missing protective cover on emergency light: The light was removed from the area and the wires exposed were ran back into the conduit to prevent any ice build up on exposed wires. Wrench with peeling ID label: The wrench was immediately removed and engraved. A retraining was performed with all Supervisor to make sure equipment is always engraved and labels are not placed on them for identification.

CORRECTIVE ACTION: Ice on the ceiling: Shipping Manager conducted a training with his team to ensure that the freezer ceiling will be scrapped off ice once a week. Finished Goods Freezer Door: Maintenance straightened the door to make sure that there is no gap when the door is closed. There is a functioning air curtain that is in place to ensure that there is no pest intrusion or loss of cooling. Also, there are plastic curtains behind this door to make sure that there is no pest intrusion or loss of cooling. A quote had been submitted to fix this door. Missing protective cover on emergency light: The light was removed from the area and the wires exposed were ran back into the conduit to prevent any ice build up on exposed wires. Wrench with peeling ID label: The wrench was immediately removed and engraved. A retraining was performed with all Supervisor to make sure equipment is always engraved and labels are not placed on them for identification.



VERIFICATION OF CLOSEOUT: The auditor reviewed the training documents and quote for the door. This submission meets the criteria of the SQF code element 11.1.7.2

COMPLETION DATE: 11/11/2022 **CLOSEOUT DATE:** 11/13/2022

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.1.7.5	Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices. **RESPONSE:** COMPLIANT
11.1.7.6	Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified. **RESPONSE:** COMPLIANT
11.1.7.7	All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT
11.1.7.8	Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard. **RESPONSE:** COMPLIANT
11.1.7.9	Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained. **RESPONSE:** COMPLIANT
11.1.8	**Grounds and Roadways** The grounds surrounding the site are well maintained and free from waste and accumulated debris. Surroundings are kept neat and tidy and do not present a hazard to sanitary operations. There is a designated eating and smoking area located outside the employee breakroom of the site's grounds area. There are There are no path from amenities leading to site entrances.
11.1.8.1	A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site. **RESPONSE:** COMPLIANT
11.1.8.2	Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris. **RESPONSE:** COMPLIANT
11.1.8.3	Paths from amenities leading to site entrances shall be effectively sealed. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no path from amenities leading to site entrances.

11.2.1	**Repairs and Maintenance** Maintenance procedures and responsibilities are outlined in the Repairs and Maintenance SOP. The Maintenance Manager (Lenny Crookham) is responsible for Preventive Maintenance program and all maintenance activities. The site primarily uses an software program (Manager Plus) for the PM and unscheduled repairs of the site's equipment/building. No work orders are used for PM service. A Work Order List is generated and used when performing a PM or repair. The auditor reviewed the Preventive Maintenance Schedules maintained for each piece of equipment and reviewed the completed monthly PM Maintenance work orders for Wolf Bagger on Black Forest Lines 1 + 3 for the months of April, May, June and July 2022. The Spiral Coolers for Lines 1 + 3 are serviced quarterly by a contracted service provider. The auditor reviewed the "Service Reports" dated 4/9/2022 and 8/29/2022. The procedure is an Open Work Order process where an unscheduled repair is verbally communicated to the Maintenance department, work performed and then entered into the Manager Plus software database by the Maintenance person once completed. Once the work is completed, the Maintenance Manager closes the work order. The auditor reviewed the completed work order form dated 10/15/2022 for the unscheduled repair of the Black Forest Filler on Line 1. All maintenance personnel and contractors are trained in the company's GMP's and personal hygiene practices. The outside contractors are trained for GMP's, Personal + Food Safety at their initial visit(s). A Temporary Repair procedure exist in the Maintenance SOP. No temporary repairs were observed during the facility audit. If work is done on food contact surfaces, the area is further cleaned + sanitized by the applicable Production personnel. The food-grade and non-food grade chemicals are secured and stored segregated from one another in separate locations: Food grade chemicals are stored on a shelf in the Maintenance shop and the non-food grade chemicals are stored in a secured fire proof cabinet in the Maintenance area located outside on the site's grounds. The auditor reviewed the following Food Grade chemical SDS's: BelRay Food Grade Waterproof Chain Lubricant dated 5/12/2016; v3 and Non-Food Grade chemicals: Liquid Wrench (aerosol) dated 10/4/2017 and Chevron Hydraulic Oil dated 2/5/2016; v15 .
11.2.1.1	The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. **RESPONSE:** COMPLIANT
11.2.1.2	Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety. **RESPONSE:** COMPLIANT
11.2.1.3	Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule. **RESPONSE:** COMPLIANT
11.2.1.4	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas. **RESPONSE:** COMPLIANT
11.2.1.5	The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times. **RESPONSE:** COMPLIANT
11.2.1.6	Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions. **RESPONSE:** COMPLIANT
11.2.1.7	Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product. **RESPONSE:** COMPLIANT
11.2.1.8	Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces. **RESPONSE:** COMPLIANT

11.2.2	**Maintenance Staff and Contractors** Contractor's are required to sign-in and out in a log at the main entrance. Visitors are also required to read and sign the GMP requirements and meet the CDC's COVID-19 requirements. If not trained, they are to be escorted at all time while onsite. All visitors are required to follow the employee GMP and clothing requirements. Appropriate clothing, PPE and footwear (boots or booties)are covered in the requirements. The auditor reviewed the Maintenance Shift reports dated 11/8/2021, 7/12/2022 and 10/11/2022 showing the Maintenance staff and contractors are removing all tools and debris from any maintenance activity once it has been completed,
11.2.2.1	Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3). **RESPONSE:** COMPLIANT
11.2.2.2	All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. **RESPONSE:** COMPLIANT
11.2.2.3	Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations. **RESPONSE:** COMPLIANT
11.2.3	**Calibration** The methods and responsibility for the calibration of onsite equipment are defined. All scales are calibrated annually by a contracted Scale Service. The auditor reviewed the Calibration Test Reports dated 7/24/2022 for production and lab scales. The weights used to verify the onsite scales were calibrated at that time. The auditor reviewed the Test Weight Verification Report dated 11/2/2021. All weights were within their stated tolerance. All onsite scales are verified weekly by the QC personnel using the site's certified weight set. The auditor reviewed the Scale Calibration Records for the month of September 2022. Certified thermometers are used to verify the cooking and chilling temperature limits during processing product. The auditor reviewed the NIST Traceable Certificates of Calibration for the onsite digital probe thermometers that are serviced on 7/24/2022 with re-calibration dates of 7/24/2023. All were within their measuring tolerances. Two Thermoworks Dry Well HiTemp 140 units (serial # 320404; D17100878) are used as the site's reference thermometer. The auditor reviewed the Certificates of Calibration dated 7/24/2022 with a recalibration due 7/24/2023. The three retort digital temperature gauges and the Cooking Kettles thermometers are serviced at least one time/year. The auditor reviewed the Certificates of Calibration dated 7/242022 for these retort and cooking kettle temperature probes. All were within their allowed tolerances. The auditor reviewed the Thermometer Calibration Logs for September 2022 regarding the thermometer verification by the QC personnel. The site passes all its packaged finished product through 2 onsite CEIA THS/MS21 metal detection units (CCP-3) on Lines 1 + 3. The auditor reviewed the CEIA Metal Detectors - THS Series Equipment Site Acceptance Test - Service Call Report Certificates of Metal Detector dated 9/23/2022 (s/n 31002430029) and 9/31/2021 (s/n 31002430028) for both metal detection units. Both passed their tests. The FSQA Manager is responsible to make a decision regarding product when calibration is out of spec (place on HOLD). QA/Management will follow-up. Only authorized/trained personnel are allowed to verify the calibrations of measuring devices.
11.2.3.1	The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate. **RESPONSE:** COMPLIANT
11.2.3.2	Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied. **RESPONSE:** COMPLIANT
11.2.3.3	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule. **RESPONSE:** COMPLIANT
11.2.3.4	Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration. **RESPONSE:** COMPLIANT

11.2.3.5	Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use. **RESPONSE:** COMPLIANT
11.2.3.6	A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained. **RESPONSE:** COMPLIANT

11.2.4 Pest Prevention

A Pest Control Program is in place with a contracted Pest Control provider. An IPM program is in place with a contracted Pest Control provider (Georgia Department of Agriculture; Structural Pest Division; Company License # 99219; effective date: 6/30/2011 and expiration date: 6/30/2023). The pest control service is performed on a weekly basis for the interior + monthly for the exterior services. The Plant Manager is the responsible person onsite. The auditor reviewed the Pest Elimination Scope of Service dated 11/5/2021 and the PCO license (William Rogers JR) are current (License # SP15251; expires 6/30/2023). The PCO will seek the Plant Manager (Melinda Hall) when onsite and discuss any pest concerns. No incidents of contamination from pest infestation. Auditor reviewed the service reports for 1/20/2021, 4/8/2021 and 7/20/2021. They are generated offsite and are delivered to the Plant Manager via email and the service provider's portal site with discussions of their findings. A site map is on file, dated 7/20/2020 and is current. There are 47 exterior bait traps; 86 interior Multi-Catch traps and 9 interior insect lights onsite. The approved pesticides are listed in the F&B Approved Products List - US Only of the IPM Plan. Pesticide usage is stated on a stand alone report, as well as on the service reports. SDS's for the approved chemicals are available in binder. The MOI is in binder and is current (issued 12/31/2021; expires 12/31/2022). No pesticides/rodenticides/insecticides kept onsite. All brought in, applied and removed by the PCO. Reviewed SDS for both the First Strike Soft Bait dated 8/13/2019 and Contrac All Weather Blox (EPA # 12455-889 dated January 2015 and Tempo SC Ultra Insecticide dated 2/22/2018. Trending reports are generated quarterly and report on an annual trends. The auditor reviewed the last Pest Activity Trend report for August 2022.

11.2.4.1	A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends. **RESPONSE:** COMPLIANT
11.2.4.2	Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied. **RESPONSE:** COMPLIANT
11.2.4.3	Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained. **RESPONSE:** COMPLIANT
11.2.4.4	Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution. **RESPONSE:** COMPLIANT
11.2.4.5	Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no pesticides stored onsite.

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

11.2.5 Cleaning and Sanitation

Chairmans Food Products has established procedures for Cleaning and Sanitation of processing and storage areas, food handling equipment and all areas of the facility meeting FSIS Directive 5000.1, 9 CFR 416.. The Production Manager and the FSQA Manager are responsible for the Sanitation program. The auditor reviewed the Sanitation Cleaning Sheets which exist for weekly, monthly and bi-annual cleaning. Detailed SSOP's have been developed, implemented and maintained by the FSQA Manager on the company's secured shared drive. The auditor reviewed the SSOP's for the Bagger, Conveyors, Check Weigher, Metal Detector and Conveyor, Potato Peeler, Test Kettle, Shear and Diaphragm Pumps, Wolf Baggers and Retort (BDK-SCP-001; 4/12/2020). All were comprehensive with detailed cleaning instructions and chemical usage concentrations. Employees performing Sanitation duties have received specialized training by the representative of the sanitation chemical supplier (auditor reviewed Training Sign-in Sheet dated 1/23/2022 and the applicable Chemical Safety/Hazard Communication Training Test dated 8/15/2021 with applicable Chemical Awareness Training). The site does use a CIP system for the spiral freezers and Line # 1 kettle. Mix concentrations of the sanitation chemicals are verified every sanitation cycle (Weekly) by the production personnel. The auditor reviewed the Titration logs for the 4/18/2022 and 9/26/2022. The site has a current Approved Chemical Inventory Control Listing performed weekly by an onsite employee. The auditor reviewed the Sanitation/Chemical Inventory Control Report for 8/7/2022. All sanitation chemicals and sanitizers are stored in a secured area (Chemical Cage) with restricted access. The cleaning chemical mix stations exist in the Chemical Cage Area and are maintained by the contracted Sanitation supply service representative. Company employees do not mix any cleaning/sanitizing chemicals. Empty containers are collected and removed by a contracted waste disposal service provider. Cleaning/sanitizing is verified by a Pre-operational procedure conducted by a QA technician both visually and ATP swabbing daily. Sanitation verification is performed using ATP swabbing (Charm Sciences Novalum ATP System with the Pocket Swab Plus swabs). The site performs its pre-operational inspections of the sites processing/packaging equipment weekly (Mondays). Due to this audit staring at a time after the pre-operational inspections had been completed, the auditor could not witness a pre-operational inspection. The auditor reviewed the completed Pre-Operational Inspection - Line 1 + Line 3 dated 4/8/2022 and 9/26/2022. The auditor reviewed the SDS's for the following chemicals: Mauser Madison 75 dated 6/5/2020; Alpet E3+ (hand sanitizer) dated March 2017; v2; Dart Degreaser dated 11/15/2017; Component FT-103 (Quat Powder) dated 2/3/2016; Chlor-Clean dated 11/29/2018; Pro Clean Degreaser dated 12/11/2020 and Proclean Foam dated 8/24/2018.

11.2.5.1	The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program. **RESPONSE:** COMPLIANT
11.2.5.2	Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents. **RESPONSE:** COMPLIANT
11.2.5.3	Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained. **RESPONSE:** COMPLIANT
11.2.5.4	Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained. **RESPONSE:** COMPLIANT
11.2.5.5	Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves. **RESPONSE:** COMPLIANT

11.2.5.6	Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required. **RESPONSE:** COMPLIANT
11.2.5.7	Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel. **RESPONSE:** COMPLIANT
11.2.5.8	Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean. **RESPONSE:** COMPLIANT
11.2.5.9	The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained. **RESPONSE:** COMPLIANT
11.3.1	**Personnel Welfare** Employees are trained on infectious disease concerns during their new hire training and in their GMP refresher training. During the audit, there were no employees observed in production areas who showed signs of infectious diseases. Sick personnel are sent home and not allowed to come in contact with product +/or direct contact packaging. Employees are responsible to report to management if they are sick. If sick with a known pathogen, the employee must return to work only with a doctor's note. The client has implemented a policy regarding the COVID-19 pandemic where employees are instructed to wear an appropriate mask, practice social distancing and wash/sanitize their hands. Presently, the site follows the CDC's guidelines and these requirements are now voluntary. The auditor reviewed the Enhanced Preventive Measures dated 4/17/2021 for the onsite employees. Presently, the site follows the CDC's guidelines and these requirements are now voluntary. Employees are trained on exposed cuts and lesions. Employees with any cuts, lesions or exposed sores must use bandages/band aids to cover. If they are employed to handle product or direct food packaging, they will be required to use company provided blue nitrile gloves. Metal detection is used onsite; blue metal detectable band aids are required by employees. During the audit, there were no employees observed in the production areas who showed signs of having open wounds or lesions. Water consumption is not allowed in the processing/warehousing areas. Use of tobacco, eating, drinking or smoking is not allowed in the facility. A employee breakroom/lunchroom is available to employees for eating and drinking.
11.3.1.1	Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces. **RESPONSE:** COMPLIANT
11.3.1.2	The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of. **RESPONSE:** COMPLIANT
11.3.1.3	Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing. **RESPONSE:** COMPLIANT
11.3.2	**Handwashing** Employees are instructed to wash their hands before starting and/or returning to work. Observation of employees during the audit noted adherence to the facility hand wash policy. Hand wash sinks are located at the employee entrances, all Processing/Packaging departments, in the bath rooms and break rooms. All hand wash basins are constructed of stainless steel or non-corrodible materials and operated by sensors. All wash basins are supplied with water at appropriate temperatures, liquid soap, paper towels and a waste container. Signs are available at all wash stations which are legible and prominently displayed in English.

11.3.2.1	All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material. **RESPONSE:** COMPLIANT
11.3.2.2	Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required. **RESPONSE:** COMPLIANT
11.3.2.3	Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels. **RESPONSE:** COMPLIANT
11.3.2.4	The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no high risk areas onsite.
11.3.2.5	Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable. **RESPONSE:** COMPLIANT
11.3.2.6	When gloves are used, personnel shall maintain the handwashing practices outlined above. **RESPONSE:** COMPLIANT
11.3.3	**Clothing and Personal Effects** Facility is not high risk. Clothing worn by staff is properly maintained, clean and did not pose a risk to the product. A Clothing Risk Assessment (11/1/2021) was performed onsite by the Production team and satisfies the SQF code element 11.3.3.1. A contracted laundering service is responsible for supplying and maintaining the site's PPE (smocks) and full uniforms for the Maintenance staff. Quality and line leads are responsible for the visual continual inspection of employee apparel. The supplied smocks and uniforms do not present a contamination risk. No jewelry allowed to be worn in processing where exposed product exist except for plain ring bands. Small objects (i.e. pens) must be kept below waistline.
11.3.3.1	The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination. **RESPONSE:** COMPLIANT
11.3.3.2	Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products. **RESPONSE:** COMPLIANT
11.3.3.3	Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition. **RESPONSE:** COMPLIANT
11.3.3.4	Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk. **RESPONSE:** COMPLIANT
11.3.3.5	Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment. **RESPONSE:** COMPLIANT

11.3.3.6	Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT
11.3.3.7	Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities. **RESPONSE:** COMPLIANT
11.3.3.8	Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management. **RESPONSE:** COMPLIANT
11.3.4	**Visitors** Visitors are required to sign-in on a tablet at the main entrance. Visitors are also required to read and sign the GMP requirements, answer a COVID-19 questionnaire and have their temperatures taken and recorded prior to entering the facility. Appropriate clothing and footwear are covered in the requirements. All visitors are required to follow the employee GMP and clothing requirements.
11.3.4.1	All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing and handling areas or shall be escorted at all times in food processing, handling, and storage areas. **RESPONSE:** COMPLIANT
11.3.4.2	All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area. **RESPONSE:** COMPLIANT
11.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed. **RESPONSE:** COMPLIANT
11.3.4.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements. **RESPONSE:** COMPLIANT
11.3.5	**Staff Amenities (change rooms, toilet, break rooms)** Staff amenities have sufficient lighting and ventilation to accommodate the maximum number of plant personnel. Two lockerooms rooms exist adjacent to the Men's and Women bathrooms. Personal lockers are assigned to each employee. Wall mounted hooks for personal clothing are located in an adjacent room in each changeroom. Bathrooms are located for the employees outside the production area. Toilets are adequate in number for the maximum number of staff and constructed so that they can be easily maintained, tidy and clean. There are no showers onsite. The hand washing sinks are designed and constructed as per section 11.3.2.3. Drainage is directed to a municipal water sewage system. A procedure is in place to manage sewage backups. There is a lunchroom segregated from the production and storage areas. The lunch room have sufficient seating, utensil sink, refrigeration, microwaves and temporary storage of personal food items. It is properly ventilated, well lit, have adequate seating, hot and cold water, heating and cooling. Lunch room is kept clean and tidy. Eating is allowed at a designated area on the outside premises.
11.3.5.1	Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product. **RESPONSE:** COMPLIANT
11.3.5.2	Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean. **RESPONSE:** COMPLIANT

11.3.5.3	High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no high risk processing performed onsite.
11.3.5.4	Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas. **RESPONSE:** COMPLIANT
11.3.5.5	Where required, a sufficient number of showers shall be provided for use by staff. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no showers onsite.
11.3.5.6	Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas. **RESPONSE:** COMPLIANT
11.3.5.7	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations. **RESPONSE:** COMPLIANT
11.3.5.8	Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3. **RESPONSE:** COMPLIANT
11.3.5.9	Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests. **RESPONSE:** COMPLIANT
11.3.5.10	Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site. **RESPONSE:** COMPLIANT
11.4.1	**Staff Engaged in Food Handling and Processing Operations** Plant personnel were observed entering or exiting the facility through the designated employee entrances. Employees have been instructed to keep exterior doors closed when not in use. During the audit, all exterior doors in the production areas were observed to be maintained closed by plant personnel. There were no employees observed wearing false fingernails or fingernail polish in the processing areas of the facility. Trash containers were observed to be properly identified and emptied at a regular frequency. Due to the inherent nature of the food product (prepared meals), taste evaluation is performed in the onsite Quality lab. All wash down hose stations were properly used and stored when not in use.
11.4.1.1	All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor. **RESPONSE:** COMPLIANT

11.4.1.2	Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage. **RESPONSE:** COMPLIANT
11.4.1.3	The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized. **RESPONSE:** COMPLIANT
11.4.1.4	In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment. **RESPONSE:** COMPLIANT
11.5.1	**Water Supply** The facility uses municipal water as their potable water supply. There were no cross connections or observed issues that could affect the quality of the water. The facility tests the water for potability annually by an outside lab. Hot water is supplied to the processing areas. The auditor reviewed the "Columbus Water Works Device Test Data and Maintenance Reports" dated 3/25/2022. The 2 assemblies passed with no violations observed. The tests were performed by the Columbus Water Works (BPAT-03025).
11.5.1.1	Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility. **RESPONSE:** COMPLIANT
11.5.1.2	Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use. **RESPONSE:** COMPLIANT
11.5.1.3	Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment. **RESPONSE:** COMPLIANT
11.5.1.4	The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained. **RESPONSE:** COMPLIANT
11.5.1.5	The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage. **RESPONSE:** COMPLIANT
11.5.1.6	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No water is stored onsite.
11.5.2	**Water Treatment** The water used for processing and the facility /employees is not treated.

11.5.2.1	Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable. **RESPONSE:** NOT APPLICABLE
11.5.2.2	Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1). **RESPONSE:** NOT APPLICABLE
11.5.2.3	Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept. **RESPONSE:** NOT APPLICABLE
11.5.3	**Water Quality** Company relies upon contracted microbial lab analysis to validate water is potable. It is the responsibility of the QA personnel to perform the sampling and shipping duties. The policy dictates the sampling schedule and water used in processing is tested annually. The auditor reviewed the offsite's contracted laboratory Analytical Report (Project ID: 22-2446) dated 7/1/2022 for the microbiological analysis for Total Coliforms and E. Coli. The microbiological for total coliforms results were Absent. The auditor reviewed the 2022 Water Quality Report for Columbus and Fort Benning, GA.
11.5.3.1	Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food. **RESPONSE:** COMPLIANT
11.5.3.2	Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually. **RESPONSE:** COMPLIANT
11.5.3.3	Water and ice shall be analyzed using reference standards and methods. **RESPONSE:** COMPLIANT
11.5.4	**Ice Supply** Ice is not used onsite.
11.5.4.1	Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1. **RESPONSE:** NOT APPLICABLE
11.5.4.2	Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate. **RESPONSE:** NOT APPLICABLE
11.5.4.3	Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution. **RESPONSE:** NOT APPLICABLE
11.5.5	**Air and Other Gasses** Compressed air is used in assisting in cleaning and drying off the processing equipment. There a few pneumatic hose stations stationed in the processing, filer and packing areas equipped with "point of use" air filters to supply air that meets FDA recognized food grade standard. The auditor reviewed the technical data sheet for the SMC Compressed Air Filter Element (AF40-A, AW40-B) for particles rated at 5 microns Therefore, the air is tested monthly for yeast and mold. The auditor reviewed the EMSL Test Reports for the Bucket Elevator, Wolf Bagger and air hose located at the Retort platform: Order # 292208342 dated 10/5/2022; Order # 292207373 dated 9/8/32022 and Order # 372203410 dated 3/15/2022. All were within acceptable tolerances. The site services the air compressors and maintains the filter elements. The auditor reviewed the Equipment Inspection - Filter reports dated 8/1/2022, 7/8/2022, 5/9/2022, 3/7/2w022 + 1/25/2022.

11.5.5.1	Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety. **RESPONSE:** COMPLIANT
11.5.5.2	Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually. **RESPONSE:** COMPLIANT
11.6.1	**Receipt, Storage and Handling of Goods** The methods and responsibilities for Storage and Handling Procedures and meets the requirements of SQF code 11.6.1. Cold storage is performed at the processing facility for both raws and all finished goods. These are stored in 2 Coolers and 2 Freezers at the processing site. Ambient storage of raw ingredients + packaging exist in the warehousing area of the site. There are four allergens in the plant and final products. Therefore, segregated storage practices are required to prevent cross contamination. All products/packaging are on pallets and stored off the floor. The company practices FIFO and periodic inventory of raws, product, WIP and packaging occurs. There are no equipment storage rooms at the warehouse. No need for alternate storage exist.
11.6.1.1	The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals. **RESPONSE:** COMPLIANT
11.6.1.2	Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk. **RESPONSE:** COMPLIANT
11.6.1.3	The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented. **RESPONSE:** COMPLIANT
11.6.1.4	Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life. **RESPONSE:** COMPLIANT
11.6.1.5	Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety. **RESPONSE:** COMPLIANT
11.6.1.6	Records shall be available to verify the effectiveness of alternate or temporary control measures for the storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products. **RESPONSE:** COMPLIANT
11.6.2	**Cold Storage, Freezing and Chilling of Foods** The methods and responsibilities of Cooler/Freezer Policy are listed in the SOP and meets the requirements of the SQF code element 11.6.2. The spiral coolers, freezers and cold storage rooms are designed and constructed to allow for the hygienic and efficient refrigeration of food and easily accessible for inspection and cleaning. There are two walk-in freezers for finished product and raw material storage onsite maintained at 10°F and 2 walk-in Cooler rooms finished product and raw material storage onsite maintained at 38°F. The coolers are designed to adequately cool raws + product (< 45°F). The auditor observed sufficient cooler capacity during the facility audit. All coolers have mounted thermocouples and calibrated thermometers verified by onsite personnel to monitor the temperature. A contracted offsite refrigeration monitoring service (ACOM) monitors and contacts the applicable personnel if a nonconformance (high temperature reading) occurs. There are four allergens in the plant and final products - Dairy, Egg, Wheat and Soy. Therefore, segregated storage practices are required to prevent cross contamination.

11.6.2.1	The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and be easily accessible for inspection and cleaning. **RESPONSE:** COMPLIANT
11.6.2.2	Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas. **RESPONSE:** COMPLIANT
11.6.2.3	The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures. **RESPONSE:** COMPLIANT
11.6.2.4	Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system. **RESPONSE:** COMPLIANT
11.6.3	**Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods** The methods and responsibilities of Receiving, Storage and Transport are listed in the SOP (11.6.2; v3) and meets the requirements of the SQF code 11.6.3. There are four allergens onsite - Dairy, Egg, Wheat and Soy. The site also processes organic finished products. Therefore, segregated storage practices are required to prevent cross contamination. All packaging is properly stored on racks in the warehouse. There are no wet areas. Warehouse transportation vehicles did not pose a contamination risk. Forklift maintenance on a PM schedule. Auditor observed during the walkthrough.
11.6.3.1	Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin. **RESPONSE:** COMPLIANT
11.6.3.2	Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency. **RESPONSE:** COMPLIANT
11.6.4	**Storage of Hazardous Chemicals and Toxic Substances** Daily supplies of cleaning chemicals are properly stored in a locked cage area away from the processing/packaging areas, as well as in the Maintenance storage and Boiler areas. No risk to food products was observed. No pesticides are stored on site. Chemicals have adequate storage for their use and facility's needs. The area is secured via a lock and accessible by authorized personnel only. The site has a current Approved Chemical Inventory Control Listing performed weekly by the site's employees. There is an emergency eye-wash station and shower located in the caged storage area. The site has spill kits located at strategic areas of the site. SDS's are maintained and assessable upon request. The auditor reviewed the SDS's for the following chemicals: Mauser Madison 75 dated 6/5/2020; Alpet E3+ (hand sanitizer) dated March 2017; v2; Dart Degreaser dated 11/15/2017; Component FT-103 (Quat Powder) dated 2/3/2016; Chlor-Clean dated 11/29/2018; Pro Clean Degreaser dated 12/11/2020 and Proclean Foam dated 8/24/2018. MINOR: During the audit of the Boiler area located on the outside grounds, it was observed that 2 pails of a food-grade chemical (AEON 9000 FG-46 Food Grade Synthetic Lubricant) were observed to be stored in both of the chemical storage cabinets with the non-food grade chemicals.
11.6.4.1	Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff. **RESPONSE:** COMPLIANT

11.6.4.2	Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances. **RESPONSE:** MINOR **EVIDENCE:** During the audit of the Boiler area located on the outside grounds, it was observed that 2 pails of a food-grade chemical (AEON 9000 FG-46 Food Grade Synthetic Lubricant) were observed to be stored in both of the chemical storage cabinets with the non-food grade chemicals. **ROOT CAUSE:** Food Grade chemical stored in nonfood grade cabinet: Maintenance tech placed in the wrong place accidently. This was a discontinued chemical that had been stored in non food grade cabinet and was an oversight from Maintenance. **CORRECTIVE ACTION:** Food Grade chemical was discarded. A retraining was performed with all Maintenance department to make sure they are storing food grade and non food grade chemicals separately.  training for food grade chemicals.pdf **VERIFICATION OF CLOSEOUT:** The auditor reviewed the Training document. This submission meets the criteria of the SQF code element 11.6.4.2. **COMPLETION DATE:** 11/11/2022 **CLOSEOUT DATE:** 11/13/2022
11.6.4.3	Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-inprogress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation. **RESPONSE:** COMPLIANT
11.6.4.4	Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel. **RESPONSE:** COMPLIANT
11.6.4.5	Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,: i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements. **RESPONSE:** COMPLIANT
11.6.4.6	The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor. **RESPONSE:** COMPLIANT
11.6.4.7	In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment. **RESPONSE:** COMPLIANT

11.6.5	**Loading, Transport, and Unloading Practices** The Shipping/Receiving employee inspects all outgoing trailers as per the Outgoing Finished Product Trailer Inspection Procedure and document all pertinent information. All finished product is shipped by refrigerated trailer at 38°F and if frozen at 10°F. After the drivers presents their credentials, the dock worker verifies and records the trailer's set and operating temperatures and the truck is backed into the bay door or street for loading or unloading. The site uses an inventory control system (Macola) and Pick ticket for outbound shipments. Trailer temperatures are verified by the dock worker using a digital IR thermometer and the product temperatures are verified using calibrated digital probe thermometers. The product is pulled from inventory and loaded onto the truck. All data and observations are recorded onto the Load Diagram Log. The loading operation was observed and verified as to following proper customer/client procedures during the facility audit. All outgoing trailers are checked for GMP compliance and verify the proper temperature. All private carriers ensure the refrigeration unit is operational during transit and make periodic checks for compliance. Product temperatures are taken at the start of unloading and regular intervals during unloading. Product temperatures are verified and recorded onto the Product Receivable and Transfer Log by a dock worker using a calibrated digital probe thermometer at the commencement of unloading and at regular intervals during unloading. The trailer GMP concerns are evaluated (odors, cleanliness, damage, etc.) before and during loading/unloading takes place. Loading and unloading practices are designed to minimize any unnecessary exposure of product to conditions that could potentially affect product and package integrity. The applicable paperwork is signed by driver and dock worker. Shipments use private contracted carriers. The auditor reviewed the Product Receivable & Transfer Logs and the Load Diagram Logs (Outbound) for the first week of October 2021, second week of January 2022, third week of April 2022 and the fourth week of September 2022. The unloading operation was observed and verified as to following proper customer/client procedures during the facility audit.
11.6.5.1	The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination. **RESPONSE:** COMPLIANT
11.6.5.2	Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product. **RESPONSE:** COMPLIANT
11.6.5.3	Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems. **RESPONSE:** COMPLIANT
11.6.5.4	Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport. **RESPONSE:** COMPLIANT
11.6.5.5	Refrigerated units shall maintain the product at the required temperature. The unit’s temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable. **RESPONSE:** COMPLIANT
11.6.5.6	The refrigeration unit shall be operational at all times and checks completed of the unit’s operation, the door seals, and the storage temperature at regular intervals during transit. **RESPONSE:** COMPLIANT
11.6.5.7	On arrival, prior to opening the doors, the food transport vehicle’s refrigeration unit’s storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading. **RESPONSE:** COMPLIANT
11.6.5.8	Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity. **RESPONSE:** COMPLIANT

11.7.1	**High-Risk Processes** There are no high risk processes onsite.
11.7.1.1	The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a “kill” step, a “food safety intervention” or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized. **RESPONSE:** NOT APPLICABLE
11.7.1.2	Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety. **RESPONSE:** NOT APPLICABLE
11.7.1.3	Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function. **RESPONSE:** NOT APPLICABLE
11.7.1.4	Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination. **RESPONSE:** NOT APPLICABLE
11.7.1.5	Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination. **RESPONSE:** NOT APPLICABLE
11.7.2	**Thawing of Food** The Thawing Frozen Finished Product Procedure addresses requirements and methods for thawing rework onsite using air. This procedure is in place in case rework has to be thawed for re-introduction into the process of like finished product. There is no recent history of this site performing any thawing of rework. Not a general practice.
11.7.2.1	Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** Water thawing of product does not occur onsite.
11.7.2.2	Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination. **RESPONSE:** COMPLIANT
11.7.2.3	Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product. **RESPONSE:** COMPLIANT

11.7.3 Control of Foreign Matter Contamination

The methods and responsibility for the prevention of foreign matter contamination are documented in the Foreign Material Procedure as well as several pointed and specific SOP's (Glass/Ceramic/Brittle Plastic Policy; Wood Control Policy and Portable Equipment & Utensils Procedure). Responsible personnel are the senior management personnel. Employees are trained regarding foreign material contamination (auditor reviewed training records dated 2/3/2022). Preventative maintenance and internal audits are performed to ensure plant and equipment remains in good condition. Temporary fasteners are not allowed. Company maintains a Glass, Brittle Plastics and Ceramic Inventory Form broken down by plant areas. Onsite inspection performed by the QA personnel on a monthly basis. The auditor reviewed the Glass + Plastic audits dated 11/6/2021, 1/5/2022, 4/23/2022 and 9/6/2021. Pre-Op Inspections are performed regarding any glass/plastic instrument covers and loose metal objects. Wooden pallets are in good condition and used primarily in a dry environment. Knives are assigned to employees at the beginning of the shift. No snap off blades are allowed onsite. Knives are inspected for any noncompliance (broken, missing pieces) during the shift. The auditor reviewed the Portable Equipment or Utensil Issuance Logs for the first and second Production shifts dated 10/12/2021 and 9/29/2022.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.7.4	**Detection of Foreign Objects** The auditor reviewed the Metal Detector Policy on file. The client uses metal detection (CCP-3) to run all its packaged product through in order to check for metal contamination. There are 2 metal detectors positioned on Lines 1 + 3 in the Packaging Room. The Production personnel perform a metal detector check at startup, the beginning of each batch with a frequency of every hour and at the end of the production run. On 10/17/2022, the auditor witnessed metal detector checks for both onsite metal detectors performed in the Pack Room by the Packing Supervisor. The test piece sizes are: Ferrous: 2.5 mm; Non-Ferrous: 3.0 mm and S.S 4.5 mm. The checks are documented on the CCP-3 Daily Metal Detector Check Sheet. Both checks were compliant. The auditor reviewed the Metal Detector Check sheets for the dated 10/4/2021, 9/3/2022, 4/19/2022 and 9/29/2022. All were compliant. The site employs a shear pump on liquid-type products (i.e. COSTCO Alfredo Sauce) and monitors it for any foreign material when cleaned. The auditor reviewed the Line # 1 Shear Pump Logs maintained on the Bag Seal Check Sheets dated 10/4 -9/2021, 1/11-12/2022, 4/28/20223 and 9/3-4/2022 and the Line 3 Foreign Material Inspection Forms dated 3/25/2022, 10/4-13/2022, and 7/1-28/2022.
11.7.4.1	The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented. **RESPONSE:** COMPLIANT
11.7.4.2	Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process. **RESPONSE:** COMPLIANT
11.7.4.3	Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected. **RESPONSE:** COMPLIANT
11.7.4.4	Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections. **RESPONSE:** COMPLIANT
11.7.4.5	In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition. **RESPONSE:** COMPLIANT
11.8.1	**Waste Disposal** The responsibility and methods are outlined in the Dry, Wet and Liquid Waste procedure. All trash from production, packaging, administration, etc. are removed at end of shift, day, or batch to a compactor by trained personnel. No areas observed with waste accumulation. Containers for waste are properly maintained and vehicles and equipment used for waste are properly cleaned. There is a compactor for processing trash and inedible waste. there is also an open dumpster on the grounds for large items (pallets, metal pieces, etc.). There is 1 bailer onsite used for bailing secondary packaging for recycling. All waste/trash is removed by an outside contracted waste disposal provider and is removed when required (3 days/week). Daily monitoring of the control of waste materials is performed. There are no trademarked materials onsite.
11.8.1.1	The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented. **RESPONSE:** COMPLIANT
11.8.1.2	Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken. **RESPONSE:** COMPLIANT
11.8.1.3	Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements. **RESPONSE:** COMPLIANT
11.8.1.4	Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin. **RESPONSE:** COMPLIANT

11.8.1.5	Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging. **RESPONSE:** COMPLIANT
11.8.1.6	Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There are no trademarked materials onsite.
11.8.1.7	Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health. **RESPONSE:** COMPLIANT
11.8.1.8	Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** There is no waste held on-site prior to disposal.
11.8.1.9	Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards. **RESPONSE:** COMPLIANT
11.8.1.10	Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports. **RESPONSE:** COMPLIANT