



GMP Inspection Results Report

Consolidated Standards for Inspection: Prerequisite and Food Safety Programs

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

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

Document Section	Description
Score and Rating	x Description of the facility x Number of findings and related risks x Category scores and total score x Rating
Participant Names	Personnel from the facility who accompanied the inspector
Facility-Specific Questions	Technical information about a facility. For example: bulk materials used, temperature control equipment used.
Location Matrices	Two matrices which categorize findings by Category and Risk
Findings with Risk	Descriptions and recommendations related to all findings
Additional Comments	Comments made by the inspector that have no risk assessment
Standards without identified Risks or Findings	Standards that are applicable to the inspected facility, but based on random review and observation samplings at the time of the inspection, the facility appears to be meeting requirements
Standards Not Applicable	Standards that are not applicable to the inspected facility

Score and Rating

Inspection Information:

Facility Name	Chris's Cookies
Facility Address	100 Hollister Rd Teterboro, New Jersey 07608 United States of America
Products Produced	Baked cookies
Account #	41462

Standard Used	Prerequisite and Food Safety Programs
Date(s) of Inspection	07-Jun-2021
Audit Type	GMP
Inspection Type	Scored
Announcement Type	Announced

Expected Scope	
Variations From Expected Scope	There was not access to the roof.

Reinspection	Yes
Terminated	No

Score

Category	Minor Issues Noted (180-195)	Improvement Needed (160-175)	Serious (140-155)	Unsatisfactory ≤ 135	Scores
Operational Methods and Personnel Practices	1	0	0	0	195
Maintenance for Food Safety	3	0	0	0	185
Cleaning Practices	1	0	0	0	195
Integrated Pest Management	0	1	0	0	175
Adequacy of Prerequisite and Food Safety Programs	3	0	0	0	180
Total Score					930

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

Participant Names

Name	Role	Inspection	Closing Meeting
Mr. Chris Gargiulo	CEO	Yes	Yes
Mr. Chris Lazo	Regional Operations Manager, RK Environmental Services	Yes	-
Bill Steadman	Auditor	Yes	Yes

Facility-Specific Questions

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

Findings by Location and Category

Locations	Operational Methods and Personnel Practices	Maintenance for Food Safety	Cleaning Practices	Integrated Pest Management	Adequacy of Prerequisite and Food Safety Programs	Totals by Location
Facility Overview	0	1	0	0	3	4
Raw Material Storage	1	1	0	0	0	2
Shipping Area	0	1	0	0	0	1
Support Areas	0	0	1	1	0	2
Totals by Category	1	3	1	1	3	9

Findings by Location and Risk

Locations	Minor Issues Noted	Improvement Needed	Serious	Unsatisfactory	Totals by Location
Facility Overview	4	0	0	0	4
Raw Material Storage	2	0	0	0	2
Shipping Area	1	0	0	0	1
Support Areas	1	1	0	0	2
Totals by Risk	8	1	0	0	9

Findings with Risk

#	Risk	Standard	Standard #	Requirement #	Location
1	Improvement Needed (IN) Finding: Recommendation:	Identified Pest Activity Approximately 25 mouse droppings were observed in the out of service restroom located in the warehouse. Additionally, six rodent droppings were also observed behind the hot water heater, near the rack washer. Neither of these areas were a product storage or production area. Currently, there were not any pest control devices in these locations. The IPM contracted PCO was on-site during the inspection and was made aware of the activity and started work on a corrective action plan to address these issues. These areas should be scheduled for cleaning to remove the rodent droppings. Decommissioned areas of the bakery should also be included in the self-inspection program.	4.16	4.16.1.2	Support Areas
2	Minor Issues Noted (MI) Finding: Recommendation:	Storage Conditions The "U" racking supports for the raw material storage racks had an accumulation of dust and product debris. There were no signs of insect activity. To prevent any future risks, it was recommended this area be scheduled for cleaning to remove the debris. More frequent and detailed cleaning will aid in preventing recurrence.	1.4	1.4.1.1	Raw Material Storage
3	Minor Issues Noted (MI) Finding: Recommendation:	Outside Grounds and Roof The cement pad for the trash dumpster was deteriorated and allowed standing water to accumulate. There were no signs of pest activity. To prevent any future issues, the cement pad should be repaired so water will not accumulate in this area.	2.2	2.2.1.4	Facility Overview
4	Minor Issues Noted (MI) Finding: Recommendation:	Floors The wall/floor junction located in the shipping dock was deteriorated and had a half inch gap. There were no signs of pest activity. To prevent an escalation of this issue, the wall/floor junction should be sealed. Issues such as this should be reported to maintenance to ensure timely repairs take place.	2.4	2.4.1.2	Shipping Area
5	Minor Issues Noted (MI) Finding: Recommendation:	Drains For the most part, drain grates appeared to be easily removed for cleaning and inspection; however, the drain grate to the small four inch drain near the raw ingredient racks and in the old restroom could not be removed. There wasn't any evidence of pest activity or accumulation of debris. To prevent any future issues, the drain grate should be modified to allow removing it for cleaning and inspection.	2.5	2.5.1.3	Raw Material Storage
6	Minor Issues Noted (MI) Finding: Recommendation:	Non-Product Zone and Support Area Cleaning An accumulation of dirt, dust and debris was found behind and underneath the transformer located in the enrobing room. There were no signs of pest activity, and this was an isolated case. It was recommended this area be scheduled for cleaning to remove the debris. More frequent and detailed cleaning will aid in preventing recurrence.	3.9	3.9.1.3	Support Areas

7	Minor Issues Noted (MI)	Self-Inspections	5.4	5.4.1.2	Facility Overview
	Finding:	Monthly self-inspections of the entire facility, including the outside grounds, were conducted; however, during the audit shortcomings in the program were identified.			
	Recommendation:	Continued emphasis should be placed on conducting more detailed and in-depth inspections to address the issues noted, such as the mouse droppings and the deteriorated wall/floor coving, as detailed in the body of this report. This clause was rated based on severity.			
8	Minor Issues Noted (MI)	Cleaning Program	5.11	5.11.1.1	Facility Overview
	Finding:	A written Cleaning Program was developed for the facility; however, during the inspection shortcomings were observed in the program.			
	Recommendation:	It was recommended the cleaning program be updated to address the concerns noted, such as the debris in the racking "U" joints and the debris underneath the transformer, as noted in this report. These areas should be added to the master cleaning schedule to ensure routine cleaning takes place.			
9	Minor Issues Noted (MI)	Design Standards	5.26	5.26.1.1	Facility Overview
	Finding:	For the most part, the facility considered and implemented sanitary design principles as part of all structural and equipment designs; however, during the inspection a shortcoming was identified.			
	Recommendation:	The facility should consider changes to the sanitary design standards to address the concerns noted, such as the drain grates that couldn't be removed for inspection and cleaning, as describe in this report.			

Additional Comments

#	Risk	Standard	Standard #	Requirement #	Location
1	Comments Finding:	Food Defense Program Food defense trained personnel had conducted a vulnerability assessment. This was reviewed at least annually or as required by regulations. Due to the very small business status, this bakery was exempt from the requirements of CFR 21 part 121.	5.15	5.15.1.1	Facility Overview

Standards without identified Risks or Findings

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

Standard	Standard #	Standard Goal
Rejection of Shipments/Receipt of Dry Goods	1.1	Random review of records and programs related to safeguarding of food products by identifying and barring entry to potentially contaminated raw materials indicate they met the requirements of the standard as applicable to this site.
Rejection of Shipments/Receipt of Perishables	1.2	Random review of the records and programs related to receipt of perishable products by identifying and barring entry to potentially contaminated raw materials indicate they met the requirements of the standard as applicable to this site.
Storage Practices	1.3	Materials appeared to be stored in a way that met the program requirements as defined by this site, as well as the applicable requirements in the standard.
Raw Material/Finished Product Inventory	1.5	Raw material and finished product inventories appeared to be maintained at a reasonable volume. Random review of materials did not identify aged or infested materials during the inspection.
Pallets	1.6	Pallets examined were found to be clean and well maintained.
Carry-over and Rework	1.7	Random review indicated that raw materials, rework, work-in-progress, and carry-over as applicable to the facility were identified to prevent misuse and managed in a way to prevent contamination issues.
Processing Aids	1.11	Processing aids randomly reviewed were labeled and food approval documentation was provided.
Material Transfer	1.12	Observation indicated that raw materials were transferred, handled, and managed at the time of inspection to prevent contamination of materials. This included transfer of materials to point of use and transfer of materials to secondary containers as applicable to the facility.
Foreign Material Control Devices	1.15	Foreign material control devices, such as metal detectors and magnets, were installed to provide foreign material control. Testing of the devices in service during the inspection and random review of the documentation of checks of these devices and Corrective Action documentation indicated that the Foreign Material Control Programs were being followed as defined for the facility.
Waste Material Disposal	1.16	Waste material and waste material removal were managed to avoid product contamination.
Ingredient Containers, Utensils, and Tools	1.17	Ingredient containers, utensils and tools were managed to prevent product contamination.
Allergen Handling	1.18	Random review indicated that materials containing allergens were identified and handled in a way to prevent cross-contamination.

Workspace Arrangement	1.19	Workspace areas reviewed during the inspection were found to be clean and well maintained.
Single-Service Containers	1.20	Single-service containers appeared to be properly disposed of to prevent reuse.
Hand Contact	1.21	Hand contact with product observed during the inspection was limited where possible and practical to prevent contamination.
Controlled Temperature for Food Safety	1.22	Appropriate storage temperatures were noted during the inspection to prevent microbial growth in susceptible food products.
Cross Contamination Prevention	1.23	Incompatible or hazardous materials observed during the inspection appeared to be segregated and handled to prevent product contamination.
Finished Product Transportation	1.25	Transportation and finished product coding randomly reviewed during the inspection was provided in a manner to allow traceability of materials. Transports examined during the inspection were found to be clean and in good condition.
Hand Washing Facilities	1.26	Hand washing facilities examined during the inspection appeared to be appropriately located, functional, and stocked to allow hand washing to occur.
Washrooms, Showers, and Locker Rooms	1.27	Employee welfare areas examined were maintained in good condition.
Personal Hygiene	1.28	No personal hygiene practices issues were identified during the inspection.
Work Clothes, Changing Facilities, and Personnel Areas	1.29	Appropriate clothing or uniforms were observed to be clean and in good condition. Changing facilities were provided.
Personal Items and Jewelry Control	1.31	No issues with the control of jewelry or personal items were identified during the inspection.
Health Conditions	1.32	Health policies were defined for the facility. No issues that were inconsistent with these policies were identified.
Non-Facility Personnel	1.33	Non-facility personnel were observed to be in compliance with the facility defined GMP Programs.
Examination of Materials	1.37	Materials that could not be examined with foreign material control devices were visually examined prior to use.
Facility Location	2.1	No evidence of issues from local activities or the facility location were identified during the inspection.
Layout	2.3	No issues with placement of equipment and structures were identified. Appropriate access for cleaning, inspection, and maintenance activities was noted.
Walls	2.6	Walls examined during the inspection were found to be in good condition.
Ceilings and Overhead Structures	2.7	Overhead structures that could be examined were found to be clean and in good condition.
Glass, Brittle Plastics, and Ceramics Control	2.8	No issues with glass, brittle plastics, or ceramics were identified during the inspection.

Pest Prevention	2.10	No identified issues with building maintenance were observed that would allow pest harborage or entry into the facility.
Leaks and Lubrication	2.11	Catch pans or other devices were provided to protect product from contamination from lubrication or leaks.
Lubricants	2.12	Food-grade lubricants were identified for use on food processing and packaging equipment and were labeled and segregated from non food-grade lubricants.
Cross Contamination Prevention	2.13	Segregation of operations based on process flow appeared to be practiced as observed during the inspection.
Equipment and Utensil Construction	2.14	Equipment and utensils observed during the inspection were designed and made of materials to allow easy cleaning and maintenance.
Temporary Repair Materials	2.15	Temporary repairs noted during the inspection were consistent with the facility defined program.
Equipment Calibration	2.16	Equipment critical to food safety were routinely calibrated and monitored to ensure efficiency. Records randomly reviewed indicated that calibrations were current.
Transporting Equipment	2.18	Transporting equipment appeared to be well maintained at the time of the inspection.
Parts Storage	2.19	Parts were found to be clean and properly stored at the time of the inspection.
Hand Washing Facilities Design	2.20	Hand washing facilities were provided and were observed to be operational during the inspection.
Wastewater Treatment and Sewage Disposal	2.23	Observations at the time of the inspection indicated that wastewater and sewage treatment systems were being properly maintained.
Cleaning	3.1	Cleaning appeared to be completed in a way to prevent contamination of raw materials, products, and equipment.
Cleaning Compounds and Sanitizers	3.2	Approval and verification procedures were in place for cleaning compounds and sanitizers used at the facility for food contact cleaning. Approval documentation was provided for the chemicals that were selected and reviewed.
Cleaning Tools and Utensils	3.3	Cleaning tools and utensils appeared to be managed and maintained to prevent product contamination. No issues were identified.
Cleaning Equipment	3.4	Cleaning equipment appeared to be managed and maintained to prevent product contamination. No issues were identified.
Daily (Housekeeping) Cleaning	3.5	No issues were identified with daily housekeeping practices observed during the inspection.
Operational Cleaning	3.6	Operational cleaning tasks were addressed and managed to prevent contamination. No issues were observed.
Periodic Cleaning Tasks / Product Zone	3.7	Review of cleaning of product zone areas observed during the inspection indicated that these

Cleaning		processes appeared to be effective. No issues were identified.
Maintenance Cleaning	3.8	Maintenance cleaning tasks were efficiently completed in a way that would not compromise product safety. This included removal of debris after maintenance work was complete, and accounting for small items such as nuts, bolts, washers, wire pieces, tape, welding rods and other.
Integrated Pest Management (IPM) Program	4.1	A written IPM Program outlining controls and processes to minimize pest activity were defined.
Facility Assessment	4.2	An annual assessment of the IPM Program was documented and current.
Scope of Service	4.3	The scope of service was clearly defined and included all applicable pest management activities for this facility.
Credentials and Competencies	4.4	Qualifications examined for selected IPM service providers were documented and current.
Pesticide Documentation	4.5	Pesticide labels and other applicable technical information were provided for the pesticides randomly examined during the inspection.
Pesticide Application Documentation	4.6	Pesticide application documentation was current and provided records to identify, document, and verify use of pesticides randomly examined during the inspection.
Trend Analysis	4.8	Service records of monitoring devices and pest sightings reviewed appeared to be used to identify and eliminate areas of pest activity as noted by the lack of significant activity observed during the inspection.
Monitoring Device Documentation	4.9	Monitoring devices were mapped and maintained to ensure proper placement and monitoring for pest activity and trending. The map appeared to be current based on observation during the inspection.
Exterior Rodent Monitoring Devices	4.10	Exterior rodent control devices were placed and those randomly reviewed were maintained to provide rodent monitoring and to deter entry into the facility.
Interior Rodent Monitoring Devices	4.11	Interior rodent monitoring devices were placed and those randomly reviewed were maintained to identify and capture rodents that have gained access to the facility.
Insect Light Traps	4.12	Insect light traps were provided and those reviewed were maintained to identify and monitor flying insects in the facility.
Pheromone Monitoring Devices	4.13	Pheromone monitoring devices were installed and those reviewed were maintained to assist in identification of stored product insect pests.
Bird Control	4.14	Bird control activities were addressed and the lack of activity noted during the inspection indicated that the program was effective.
Wildlife Control	4.15	No issues with identification or elimination of wildlife habitat were noted.
Accountability	5.1	Management authorization and support of supervisory compliance to programs, laws, and regulations was defined for this site and appeared to be implemented.

Support	5.2	Human and financial resources were provided to support implementation of the Food Safety and Prerequisite Programs.
Training and Education	5.3	Regularly scheduled training activities were documented and consistently carried out to ensure appropriate implementation of Food Safety and Prerequisite Programs at this facility. Records of training that were randomly reviewed were current.
Written Procedure Audits	5.5	Written procedure audits were documented to validate the appropriateness and implementation of procedures defined for this site. Records randomly reviewed indicated that audits were conducted and current.
Customer Complaint Program	5.6	A Customer Complaint Program was implemented to respond to customer concerns. Protocols were in place to ensure that food safety issues were responded to in a prompt and effective manner, whether it be at the facility level or as managed by corporate.
Chemical Control Program	5.7	A documented Chemical Control Program was implemented to provide a centralized approach to manage and control purchase and use of nonfood chemicals. Random review of chemicals and program requirements indicated that this program had been implemented as applicable for this facility.
Microbial Control Program	5.8	A risk assessment was conducted and a Microbiological Control Program was implemented and carried out to prevent potential food safety issues as applicable to the facility. Records randomly reviewed indicated that test results were within the defined limits or that Corrective Actions as defined by the program were implemented.
Allergen Control Program	5.9	Allergen controls were implemented to identify allergen control throughout the process from receiving to distribution of product. Random review of the program, records, and observations during the inspection indicated that the program was implemented.
Glass, Brittle Plastics, and Ceramics Program	5.10	A documented Glass, Brittle Plastics, and Ceramics Program was provided to identify processes that prevent contamination of product. There were no identified deficiencies noted during the inspection to indicate that the program was ineffective.
Preventive Maintenance Program	5.12	A Preventive Maintenance Program that addressed building, utensil, and equipment construction and maintenance to ensure safe food production was implemented. Observations noted during the inspection indicated that this program appeared to be effectively carried out.
Receiving Program	5.13	The Receiving Program implemented at the facility outlined and identified requirements for the raw materials received at this site. Random review of the program and documentation of receipt of materials indicated that materials receipts were consistent with the defined program requirements.
Regulatory Affairs and Inspections Program	5.14	A documented Regulatory Affairs and Inspections Program provided instructions for handling of regulatory, third party, and customer inspections.
Food Defense Program	5.15	A Vulnerability Assessment was performed to identify and reduce the risk of intentional harm to the facility, its personnel, and food products. No inconsistencies with the Food Defense

		Program, as defined for the facility, were identified during the inspection.
Traceability Program	5.16	The written Traceability Program defined the methodology to allow quick location of suspect raw materials, food contact packaging materials, rework, and related finished products.
Recall-Withdrawal Program	5.17	The written Recall/Withdrawal Program documented the procedures for quick and controlled recovery of product from the market. Random review of the records and mock recovery exercises indicated that the program was implemented as defined for this facility.
Nonconforming Product Program	5.18	The Nonconforming Products Program defined the guidelines for isolation, investigation, and disposition of raw materials, packaging materials, work-in-progress, returned goods, and finished products as applicable to the facility. Random review of records and observations during the inspection did not identify any current deficiencies with this program.
Approved Supplier Program	5.19	Evaluation of goods and services that impact the facility's food safety programs were managed as part of the Approved Supplier Program. Materials randomly selected and reviewed during the inspection appeared to meet program requirements.
Specification Program	5.20	Specifications that defined food safety requirements for raw materials, food contact packaging materials, processing aids, work-in-progress, and finished products were maintained, as applicable to this facility. Random review of materials indicated that facility defined program requirements were currently being met.
Letters of Guarantee or Certifications	5.21	Statements of assurance in the form of letters of guarantee or certifications were provided to indicate compliance to regulatory requirements for received materials and finished products. Records randomly reviewed indicated that the facility was currently meeting their program requirements.
Food Safety Plan	5.23	A Food Safety Plan that evaluated the hazards associated with the raw materials and processes related to product or food category was defined and implemented for the facility. This included the hazard analysis and identification of critical control points, as applicable, to prevent, eliminate, or reduce these hazards to an acceptable level. Random review of records indicated that the facility met the CCPs and/or Preventive Control requirements and that appropriate deviation procedures were implemented as identified by the program.
Water Quality	5.27	Water, water sources, and water management strategies were implemented to ensure safe water for product contact and use. Random reviews of the records indicated that programs were implemented.

Standards Not Applicable

Standard #	Standard Name
1.8	Dust Collection and Filtering Devices
1.9	Bulk Material Handling
1.10	Sampling Procedures
1.13	Material Sifting
1.14	Filters and Strainers
1.24	Cans, Bottles, and Rigid Packaging
1.30	High-Risk Clothing Management
1.34	Multiple-Service Shipping Containers
1.35	Glass Container Breakage
1.36	Filling, Capping and Sealing
2.9	Air Makeup Units
2.17	Compressed Air/Product Contact Gases
2.21	Bulk Systems and Unloading Areas
2.22	Ammonia Control
3.10	Clean in Place (CIP) Systems
3.11	Clean out of Place (COP) Systems
4.7	Pesticide Control
5.22	Regulated processing records
5.24	Specialized Testing
5.25	Release Procedures