NSF International

Allergen Peanut-Free Audit Addendum

Date Audited 2021-06-15

Company Name: YourBarFactory

This audit is not a HACCP Certification or Accreditation Audit. Our HACCP Certification and Accreditation Programs are distinct. This audit does not assesses the adequacy of the HACCP plans used by this facility nor does its brief review of some aspects of the HACCP plan represent a complete verification of your HACCP Plan.

Since people, processes and equipment in a facility change hourly, the NSF International cannot and does not assume any responsibility for the programs audited or for events or actions occurring prior to or subsequent to the audit. Furthermore, corrective action from the report is the responsibility of your company and NSF International does not accept any responsibility or liability as to whether or not your company carries out the recommendations, if any, as contained in the audit report.

Facility Profile

Company/Contact Information		Audit Information	
Facility# - Name	C0436712 - YourBarFactory	**Audit# - Visit#**	2644244 - 2047055
Address	160 rue Bélanger Châteauguay, Québec, Canada, J6J 4Z2	**Audit Type**	ALPNUTFR
		Template Version	1.1
		Audit Category	REGULAR
Facility Contact	Kathie Roseberry	**Audit Year**	2021
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		Audit Start Time	15-JUN-2021 08:15:00 AM
		Audit End Time	17-JUN-2021 03:30:00 PM

Product Produced:

- Cereals and snacks - rice crispies, cereal bars, protein bars, sport gels and powder

Audit Review

Company Contacts at exit interview:

Audit Contact Kathie Roseberry

NSF International's auditor will have presented and discussed these audit findings at the exit interview. If the report was not delivered at the exit interview, then an Exit Interview Summary Sheet was prepared and reflects the findings listed in this audit report. A plant representative and the auditor must sign the exit interview sheet to indicate acceptance of findings presented.

Audit Scoring Definitions

Descriptor	*Score*	*Observation Compliance*	*Documentation Compliance*
Complete	5	The requirements have been fully implemented.	Written procedures exist and sufficient documentation/records are up to date, accurate and support procedures.
Minor Non-conformance	4	Requirements are only partially implemented and no contamination is likely due to the minor non-compliance	Procedures are inadequate to define compliance to requirements. Records are incomplete, inaccurate, or of insufficient quantity to show compliance to requirements
Major Non-conformance	3	Requirements are only partially implemented and potential hazards are observed.	Procedures are absent or missing. Records are absent or missing.
Unsatisfactory	1, 2	Requirements are not being followed and resource and corrective actions needed to prevent product contamination.	Procedures do not exist. Records do not exist
Failure	0	Product contamination and food safety hazards are observed. Immediately corrective actions needed.	No programs exist. No records or documents exist.

If non-compliances are repeated on future audits the rating will be reduced by 1 and an "R" applied indicating a repeated non-compliance.

The definitions & points are meant to provide objective guidelines that ensure consistency in auditing. The scoring is in combination with a weighting system that puts more emphasis on some of the more important requirements of the audit. Any scoring of an element below 5 is provided with a comment explaining this. All elements scored below 5 require a corrective action response from the vendor/supplier. Requirements not applicable to the facility will be scored N/A.

Rating	*Numerical Score*
Gold	**95% or higher**
Silver	**90 – 94.99%**
Bronze	**85 – 89.99%**
Unsatisfactory	**80 – 84.99%**
Failure	**<79.99%**

If the auditee makes a claim of "Manufactured in a Peanut Free facility", also assess under the Peanut Free addendum and scoring at the end of this document. Score must be at least 90% to continue with the Peanut Free portion.

Summary			
Category/Section	**Earned Points**	**Possible Points**	**Section Score**
Allergen Audit			
Allergen Policy and Risk Identification	25	25	100.0%
Formulation and Traceability	25	25	100.0%
System Design and Process Control	25	25	100.0%
Rework	0	0	-
Cleaning Programs	15	15	100.0%
Allergen Awareness	19	20	95.0%
Sub-Total	**109**	**110**	**99.1%**
Peanut Free Addendum			
Policy and Management	40	40	100.0%
Receiving Storage and Handling of Ingredients	20	20	100.0%
Raw Material Supplier	15	15	100.0%
Label and Packaging Usage and Control	20	20	100.0%
Training of Personnel, Prevention Measures and Employee Practices	24	25	96.0%
Process Validation	30	30	100.0%
Sub-Total	**149**	**150**	**99.3%**
Overall Score	**258**	**260**	**99.2%**

Auditor's Note

Section 1. Allergen Policy and Risk Identification			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
1.1	A written allergen policy or program has been developed and approved by management. ***Company has a policy statement signed by the President; dated 01-06-2021 for peanut-free products: AQ-DO- PSA Nut and Peanut Free Policy. Allergen program is documented in "AQ-PR-PGA Procédure de gestion des allergènes".***	5	5/5
1.2	HACCP plans or alternative risk assessment have been completed to properly identify allergen containing ingredients. ***A risk analysis was observed to be in place for allergens including raw materials, ingredients and processing aids such as food grade lubricants. Workplace allergens from locations such as lunch rooms, locker rooms and vending machines were found to be part of the allergen program. The following allergens are present at this plant: egg, soy, milk, sesame, sulphites, and coconut (USA).***	5	5/5
1.3	HACCP plans or alternative risk assessment have been completed to properly identify allergen cross contamination hazards in the process. ***Allergens have been covered through the hazard analysis of the HACCP plan (incoming materials and each step of processes). Assessment also includes evaluation chart to measure seriousness and frequency of potential hazards based on Codex alimentarius and for the five production lines.***	5	5/5

Section 1. Allergen Policy and Risk Identification			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
1.4	Ingredients stored and used for production purposes have been identified in the risk assessment completed in 1.2. ***Allergen management procedure is well implemented. Risk assessment has been completed for HACCP plan, circulation flow, storage and labeling. Storage procedure is documented and identify cross contamination risk. This is managed through a color code system and was observed to be adequately implemented. All allergens are clearly identified and segregated in storage area.***	5	5/5
1.5	A supplier approval program has been established. ***The supplier approval procedure "AQ-PR-EAF Procédure d'évaluation et d'approbation des fournisseurs" is on site. The supplier approval and monitoring system ensures that any potential risks from raw materials and packaging to the safety, authenticity, legality, and quality of the final product are understood and managed.***	5	5/5

Section 2. Formulation and Traceability			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
2.1	Written formulae are available for each product processed. ***Allergens are well identified on the formulation and labels.***	5	5/5
2.2	Product labelling is in agreement with regulatory requirements for allergens. ***The process for product labelling is covered in "Gestion du changement" and "AW-FO-ETC Guide pour l'étiquetage des produits vendus au Canada" that details how legal requirements are met as well as information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer. Regulations have been met for Canada and USA. Labels and specifications are reviewed on a yearly basis according to the country of sale.***	5	5/5
2.3	A written program is in place to ensure the composition of the product is accurately represented on the label and on finished product specifications ***The 'Product Design and Development' procedure "AQ-PR-PDP Procédure de développement de produits" (2020-06-04) details how new products or processes and any changes to product, packaging or manufacturing processes are managed to ensure that safe and legal products are produced. It also includes guidelines on any restrictions to the scope of new product developments to control the introduction of hazards that are unacceptable to the site or customers (e.g. the introduction of allergens or microbiological risks). All new products and changes to product formulation, packaging or methods of processing are formally approved by the HACCP team leader or authorised HACCP committee member.***	5	5/5
2.4	A change management process exists for communication of allergen changes to employees and customers. ***Process is in place through daily and monthly meeting.***	5	5/5
2.5	Traceability and identification program exists and is verifiable. ***The site tests the traceability system across the range of product groups to ensure traceability can be determined from the supplier of raw material (including primary packaging) to the finished product and vice versa, including quantity check/mass balance that is carried out twice a year; this is done in conjunction with the mock recall test. The last test for selected raw Chickpeas back to source from the finished product Rspberry Granola Bar produced on 2020-12-01 was conducted on 2021-04-01. The last test for Box of Keto Chocolate Chips Bar to finished product was conducted on 2021-04-02; this also included a mass balance and was 100%.***	5	5/5

Section 3. System Design and Process Control

No	Question/Notes	Answer	Earned Points/ Possible points
3.1	Facility and equipment are designed, constructed and installed to permit effective cleaning, sanitation and inspection. *Equipment is suitably designed for the intended purpose and is utilized to minimize the risk of product contamination.*	5	5/5
3.2	New equipment or systems are engineered in compliance with allergen prevention policies *Equipement was constructed of appropriate materials, designed and located to allow for effective cleaning and maintenance. Form "PP¿FO-ANE Approbation nouvel équipement" must be completed for each new equipment.*	5	5/5
3.3	Receiving, storage and handling of ingredients, products, and packaging are controlled to prevent cross contamination with allergens. *A documented procedure "PP-PR-PEC Procédure d'entreposage" is in place to maintain product safety and quality during storage. Allergens are stored separately from other ingredients. The facilities used for the storage of raw materials, packaging, in-process products and finished products were deemed to be suitable for purpose. Procedures to maintain product safety and quality during storage included: • managing chilled product transfer between temperature - controlled areas • segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake • storing materials off the floor and away from walls • specific handling or stacking requirements to prevent product damage.*	5	5/5
3.4	Production scheduling prevents allergen cross contamination. *Products are manufactured based on an allergens matrix.*	5	5/5
3.5	During start up with allergens containing materials or at changeover involving allergen cleaning or changes in allergen declaration, there are documented procedures, checklist and documented monitoring and verification. *Procedures are well defined to describe cleaning requirements, allergens verification is performed through rapid method. Validated cleaning procedures are in place. Records of validation and verification checks and activities, and corrective actions from 2021-05-24 to 2021-05-28 were reviewed.*	5	5/5

Section 4. Rework

No	Question/Notes	Answer	Earned Points/ Possible points
4.1	Written procedures have been developed to address use of allergen containing rework ("same in to same"). *There is no reworking operation.*	N/A	0/0
4.2	Allergen containing rework is adequately separated from non- allergen containing rework. *There is no reworking operation.*	N/A	0/0
4.3	Employee practices or storage conditions for rework are not a source or possible source of allergen cross contamination. *There is no reworking operation.*	N/A	0/0

Section 5. Cleaning Programs

No	Question/Notes	Answer	Earned Points/ Possible points
5.1	Cleaning programs and scheduling are in- place to prevent the cross contamination with allergens. *Master cleaning schedule is in place for daily, weekly, monthly and annual cleaning. Allergen program incorporates all requirements for sequencing, cleaning and sanitation. The cleaning records were reviewed: - "PP-FO-ENE Formulaire d'enregistrement de nettoyage" from 2021-05-24 to 2021-05-28 - "PP-FO-ENA Formulaire d'enregistrement de nettoyage" from year 2020*	5	5/5

Section 5. Cleaning Programs			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
5.2	Cleaning procedures (SSOP's) shall detail how allergen cleaning is to be completed. ***Documented cleaning procedures are in place and maintained for the building, plant and all equipment. The cleaning methods for processing equipment, food contact surface and environmental cleaning in all areas include responsibility, areas to be cleaned, cleaning frequency, cleaning methods, cleaning chemicals, chemical concentration, temperature, materials to be used, records and verification system.***	5	5/5
5.3	Cleaning procedures effectiveness is demonstrated by pre-operative inspections and validated by testing procedures (where testing methods are available). ***The effectiveness of cleaning is assessed visually during the pre production start up checks. Production supervisors, QC inspectors, and trained employees conduct visual checks on the effectiveness of cleaning. Records were reviewed during the preoperational inspection from 2021-05-24 to 2021-05-28 and were found to be satisfactory. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods.***	5	5/5

Section 6. Allergen Awareness			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
6.1	Allergen awareness is communicated to all employees. ***Allergen awareness is posted at the facility entrance and cafeteria. All employees receive allergen training at hiring and refresher training atnleast annually. Last training was conducted on 05-01-2020. NC: Annual training was not conducted in the past year.***	4*	4/5
6.2	Employee activities are not a source of allergen cross contamination. ***No risk was identified during the audit.***	5	5/5
6.3	Employee allergen training effectiveness is verified. ***All employees receive allergen training at hiring and refresher training at least annually. The effectiveness of the training is monitored by a quiz, refresher training, coaching, mentoring or on-the-job experience.***	5	5/5
6.4	Visitors, contractors and other people circulating or working in the plant are not introducing uncontrolled allergens. ***Allergens control is included in visitors and contractors policy. Visitor and contractor are requested to read a complete allergen and GMP policy and sign their acknowledgment.***	5	5/5

Section 7. Policy and Management			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
7.1	A Letter of Commitment for a "Peanut Free Operation" from Senior Management is present. ***Management commitment is documented in AQ-DO-DSA Nut and Peanut Free Policy. It is signed by the president; dated 2021-01-06. It was displayed in lunch room.***	5	5/5
7.2	A defined Peanut Free / Allergen Control Team that can demonstrate expertise in all areas of operations. ***Management team is defined within the management commitment, management peanuts free meeting are held on a yearly basis.***	5	5/5

Section 7. Policy and Management			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
7.3	A formalized peanut risk assessment shall be conducted when there is the addition of new ingredients, processes and procedures. ***The 'Product Design and Development' procedure "AQ-PR-PDP Procédure de développement de produits" (2020-06-04) details how new products or processes and any changes to product, packaging or manufacturing processes are managed to ensure that safe and legal products are produced. It also includes guidelines on any restrictions to the scope of new product developments to control the introduction of hazards that are unacceptable to the site or customers (e.g. the introduction of allergens or microbiological risks). All new products and changes to product formulation, packaging or methods of processing are formally approved by the HACCP team leader or authorised HACCP committee member.***	5	5/5
7.4	Documented ingredients, sub ingredients, processing aids and incidental additives shall show compliance with the peanut free program. ***Documents reviewed of the selected three approved suppliers showed absence of peanut protein.***	5	5/5
7.5	The supplier shall have a written peanut protein sampling and testing protocol. ***Testing is done for all products annually or quarterly according to a risk assessment matrix. Records of validation and verification checks and activities, and corrective actions dated 2021-05-10 (Keto Chocolate Chips Bar lot # 2022) were reviewed.***	5	5/5
7.6	The supplier shall have a HACCP/Food Safety Management Program certification or equivalent. ***Suppliers has a HACCP program in place based on Codex Alimentarius and CFIA Food Safety Enhancement Program.***	5	5/5
7.7	Effective and documented procedures or the filing, maintenance, storage and disposition of all records. ***The process for management of records is covered in "AQ-PR-DOC Procédure de gestion documentaire". The retention period for records is 5 years, based on regulations and customer requirement.***	5	5/5
7.8	Private label customers shall be informed of all of all changes and modifications to their products, prior to their implementation ***The procedure Label Compliance procedure, is in place to verify the technical contents of labels comply with specifications and legal requirements for the designated country of use; include information to enable the safe handling, display, storage, and preparation of products; and include a process to verify that ingredient and allergen labeling is correct. The procedure "Gestion des changements" also describe the process undertaken whenever changes occur to the product recipe, raw materials, the supplier of raw materials, the country of origin of raw materials, and legislation.***	5	5/5

Section 8. Receiving Storage and Handling of Ingredients			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
8.1	Procedure shall be in place to ensure that all incoming materials comply with peanut free requirements. This will include but is not limited to raw materials, processing aids, truck inspection and packaging. ***A policy defining the practices for loading, unloading and storage of food products has been documented and implemented. It was observed during the audit tours that food is unloaded, stored and loaded under conditions that prevent cross contamination.***	5	5/5

Section 8. Receiving Storage and Handling of Ingredients			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
8.2	Traceability of all incoming materials shall be maintained (note this requirement is also in 2.5 of allergen audit). ***The site has a documented traceability procedure designed to maintain traceability throughout the site's processes. The procedure includes how the traceability system operates and the labelling and records required. Raw materials are identified with manufacturer lot code. WIP is through manual labelling. Finished products include best before date. The site tests the traceability system across the range of product groups to ensure traceability can be determined from the supplier of raw material (including primary packaging) to the finished product and vice versa, including quantity check/mass balance that is carried out twice a year; this is done in conjunction with the mock recall test. The last test for selected raw Chickpeas back to source from the finished product Rspberry Granola Bar produced on 2020-12-01 was conducted on 2021-04-01. The last test for Box of Keto Chocolate Chips Bar to finished product was conducted on 2021-04-02; this also included a mass balance and was 100%.***	5	5/5
8.3	Effective and documented procedure and practice will be in place to properly contain, dispose, and/or clean damaged ingredients. ***The procedure for control of non-conforming (out-of-specification product) is "AQ-PR-RT Procédure de retenue"; dated 2021-03-12. The process in place includes: reporting, identification (hold tag), secure storage in a designated area of the warehouse, responsibility and decision-making process (Hold Form and/or CAR is completed) and records including destruction for any food safety.***	5	5/5
8.4	Store other allergenic ingredients and products in such a way to prevent potential cross contamination. ***All allergenic ingredients are segregated from other ingredient. They are well identified. No risk of cross contamination was identified during the audit.***	5	5/5

Section 9. Raw Material Supplier			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
9.1	A supplier approval program has been established to prevent peanut contamination. The program shall be effective in managing risk. ***The company also has a supplier approval procedure "AQ-PR-EAF Procédure d'évaluation et d'approbation des fournisseurs" that is also based on risk and requires one or a combination of the following: Valid GFSI certification, supplier audits that includes records of auditor competence and review of a completed audit report. Low risk suppliers can be approved initially by completion of a questionnaire that covers food safety (HACCP), traceability and GPMs in place. This procedure also covers ongoing performance, these suppliers had last been reviewed on: Pumpkin Seed, Sunflower Oil, Oat Flakes, and film. The suppliers selected earlier had been approved by: GFSI Certification.***	5	5/5
9.2	Annual reviews of supplier approval programs to ensure ingredients and packaging materials are compliant with the Supplier's peanut free programs. ***All suppliers are reviewed annually.***	5	5/5
9.3	All materials suppliers to have formal communication process for any changes to the ingredients and packaging materials.	5	5/5

Section 10. Label and Packaging Usage and Control			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
10.1	The supplier shall ensure that all applicable regulations and guidelines are met. *Internal regulatory affair manager is managing the specific clients and countries requirement (US, Canada, EU).*	5	5/5
10.2	There shall be a label and packaging management program in place to ensure that when changes are made labels and packaging continue to conform to requirements. *There are controls in place with development of new products, list of raw ingredients and new production and obtain approval from the different departments before production starts. Examples reviewed during this audit included "AQ-FO-LAN Formulaire de lancement de produits" from 2020-11-23 Granola Bar box of 5, retail.*	5	5/5
10.3	The introduction of new formulas, test trial formulas, test production or new production shall not result in the presence of peanut protein cross contamination. *The policy defining the methods and responsibilities for product development has been implemented. Procedures conducted at the facility include checking formulations and processes with production trials, shelf-life trials and product testing.*	5	5/5
10.4	The Label and Packaging program shall specifically address the potential for issues with obsolete labels or packaging and packaging and labeling inventory control. *The procedure to manage obsolete packaging (including labels) was "AQ-PR-GEC Procédure de gestion du changement" and it included: • mechanisms to prevent accidental use of obsolete packaging • control and disposal of obsolete packaging • appropriate procedures for the disposal of obsolete printed materials (e.g. rendering trademarked materials unusable).*	5	5/5

Section 11. Training of Personnel, Prevention Measures and Employee Practices			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
11.1	Training shall include all employees at the facility (including temporary workers, office staff, etc). Refresher training to be provided annually for each employee. *The company has systems in place to ensure that all personnel who perform work that affects product safety, legality and quality are competent to carry out that activity, through training, work experience or qualification. All relevant personnel, including agency-supplied staff, temporary staff and contractors, receive the following training Quality Policy, GMPs, CCP (metal detector, filter), sanitation, chemicals handling, temporary repairs, pest control, allergens, Food Defense, and technical training prior to commencing work and adequately supervised throughout the working period. NC: Annual training was not conducted in the past year.*	4*	4/5
11.2	Uniforms (including shoes) shall be maintained in such a way as to prevent any potential contamination by peanuts. *Uniforms and shoes are inspected and tested according to the sampling plan.*	5	5/5
11.3	No one may bring into any area of the plant including offices and lunchrooms food containing peanut or peanut derivatives. *Included in GMP policy. Facility has policy is place, peanuts are not allowed in the facility, including visitors and contractors.*	5	5/5
11.4	All visitors, including contractors and outside workers, shall review and sign the "Peanut Free" policy before entering the facility. *Peanuts free policy is signed by all visitors including contractors, no deviation was identified during the audit.*	5	5/5
11.5	Facility shall monitor employee compliance with GMP and peanut free practices. *Inspection is performed weekly to confirm appropriate employee practices including peanut free policy implementation. Records from 2021-05-24 to 2021-04-27 were reviewed.*	5	5/5

Section 12. Process Validation			
No	**Question/Notes**	**Answer**	**Earned Points/ Possible points**
12.1	There shall be a validation procedure and program to validate all methods of cross contamination management. ***Validation procedure is documented, this was reviewed as compliant for the production reports dated 2021-05-27.***	5	5/5
12.2	Product will be on hold until validation results become available. ***The process in place for release of finished product includes: Allergen and microbiological testing or upon customer request: "AQ-PR-REL Procédure de relâche" and "AQ-PR-RDR Procédure de rétention". The product release protocol outlines personnel who are authorized to release product from hold (e.g. Quality Manager and QA Technician). Records were reviewed from 2021-05-27.***	5	5/5
12.3	Verification process shall be developed to support pre-operational inspections and follow up on Corrective Actions. Detailed records shall be maintained for cleaning, validation and verification actions. ***Testing is available for presence of allergens on equipment after cleaning (for milk, soy, peanut, gluten, and eggs). Records were checked as compliant from May 2021 during the audit.***	5	5/5
12.4	Objective testing shall be conducted as part of validation and verification based on risk assessment and hazard analysis. ***All finished products are tested annually for presence of peanut. Records of validation and verification checks and activities, and corrective actions dated 2021-03-15 were reviewed.***	5	5/5
12.5	The definition in the program for validation of effectiveness of sanitation program shall be in compliance. ***The methods, responsibilities and criteria for ensuring the effectiveness of the program is documented and observed to be adequately implemented.***	5	5/5
12.6	Analytical testing methods shall be validated / calibrated routinely for accuracy (reproducibility and repeatability) with accredited independent lab. ***Analytical testing methods are validated on a yearly basis with an accredited to ISO 17025:2005 laboratory.***	5	5/5

*Represents Non Compliances.