	LOCATION: PROBAR SALT LAKE CITY FACILITIES (SLCF) 190 N. Apollo Rd; Salt Lake City, UT 84116 USA	
NUMBER POLICY [redacted] **2.4.3**	ISSUE DATE / REVISION NUMBER: 01apr2022	SUPERCEDES: 09may2021
TITLE:: **SQF Food Safety PLAN (HACCP – HARPC)**		Page 1 of 33
Approved by: Rob Behrend		

FOOD SAFETY PLAN

HACCP / HAR-PC

-PROCESS CONTROLS-
RISK ANALYSIS

Authorized and dated: _____ See plan signature and date on process control diagram_____

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FOOD SAFETY PLAN COMMITMENT

See: 2.1.1.1 (i)(ii)(iii) Management Commitment Summary; and

2.1.1.2 (i)(ii)(iii) Food Safety Policy; and

Modules 2 & 11: Cover Page: Scope, Responsibility, and References for SLCF SQF system.doc

PREVENTIVE CONTROLS/HACCP QUALIFIED INDIVIDUAL(S) TEAM

See: 2.1.2.1 Food Safety Reporting Structure, Responsibility, and Job Descriptions; and

FOOD SAFETY TEAM

See: 2.1.2.1 Food Safety Reporting Structure, Responsibility, and Job Descriptions; and

INGREDIENT RISK ANALYSIS

See: 2.4.3.9 Ingredient Risk Analysis

PRODUCT DESCRIPTION
MEAL, PROTEIN, LIVE, PEAK, THINS, BOLT-PASSTHROUGH

PLA: KROGER SIMPLE TRUTH (PB LIVE); AMAZON (PB LIVE & PB PEAK)
CO-MAN: CAVEMAN; BALANCED TIGER, KELSI'S KITCHEN

1. PROCESS	ASSEMBLE INGREDIENTS INTO RTE SNACK BARS OR SNACK THINS. NO LETHALITY STEP.
2. Product type / name	BAR: MEAL BAR: LIVE & PLA AMAZON SIMPLY FRESH BAR: PROTEIN BAR: PEAK & PLA AMAZON CRAVE SNACK: THINS BAR: CO-MAN: CAVEMAN FOODS BAR:CO-MAN: BALANCED TIGER BAR: CO-MAN: KELSI'S KITCHENr
3. Important Product Characteristics (Temperature, pH, etc.)	Organic or Conventional; Most ingredients are as close to "raw" as possible and still preserve shelf life, roasted or steamed ingredients are preferred; RTE, no refrigeration, Low Water Activity ingredients and finished product are required, Nitrogen Flushed for shelf life. No temperature controls required for food safety.
4. How It Is to be Used	Distribution Channels to Retail Outlets to Consumer; also direct web sales. Target market age and health is self-selecting due to need for healthy chew and swallow. Product contains allergens that are clearly labeled for customer self-selection.
5. Packaging	Gas-Impermeable Foil-Lined Film Heat sealed primary packaging with cardboard shelf cartons. Packaged in standard cardboard master cases for palletizing
6. Shelf Life	MEAL: 12-Month Shelf Life; LIVE and PL: 10-Month Shelf Life; PROTEIN: 15-month Shelf Life PEAK and PL: 12mo THINS: 15mo

	Caveman Foods: 15 months Balanced Tiger: 12 Months Kelsi's Kitchen: 8mo
7. Target Market	The food's consumer is visually and tactilely self-selecting. Allergens are labeled. Persons of age and health affording dental and swallowing capacity to chew and swallow large garnishments e.g. whole nuts & peanuts, rolled oats, seeds, densely-compacted mixtures, and similar difficult to chew and swallow foods is a self-defining target market.
8. Where it will be sold	Physical 3rd-party retail stores as well as PROBAR web location where packaged foods and snacks are sold. Examples: Grocery\ Sports and Sporting\Specialty\Boutique\ "Health Food"\Convenience\etc.
9. Labeling Instructions	Nutritional Facts Ingredients Corporate Contact Information (FDA Signature) Allergy Information Optional: Certification(s) QAI, NGP, GFCO, OU Notice on some packaging: Natural-Product/"Indigenous Foreign Material" may be on labels; Some labels may optionally carry a "may contain" type statement.
10. Special Distribution Controls	Lot Code or Manufacturing Date And/or (smallest packages only have lot code for recall) "Best-By"- is preferred labeling; may be also labeled as "EXP" if space constrained. Product does not have a food-safety expiration.

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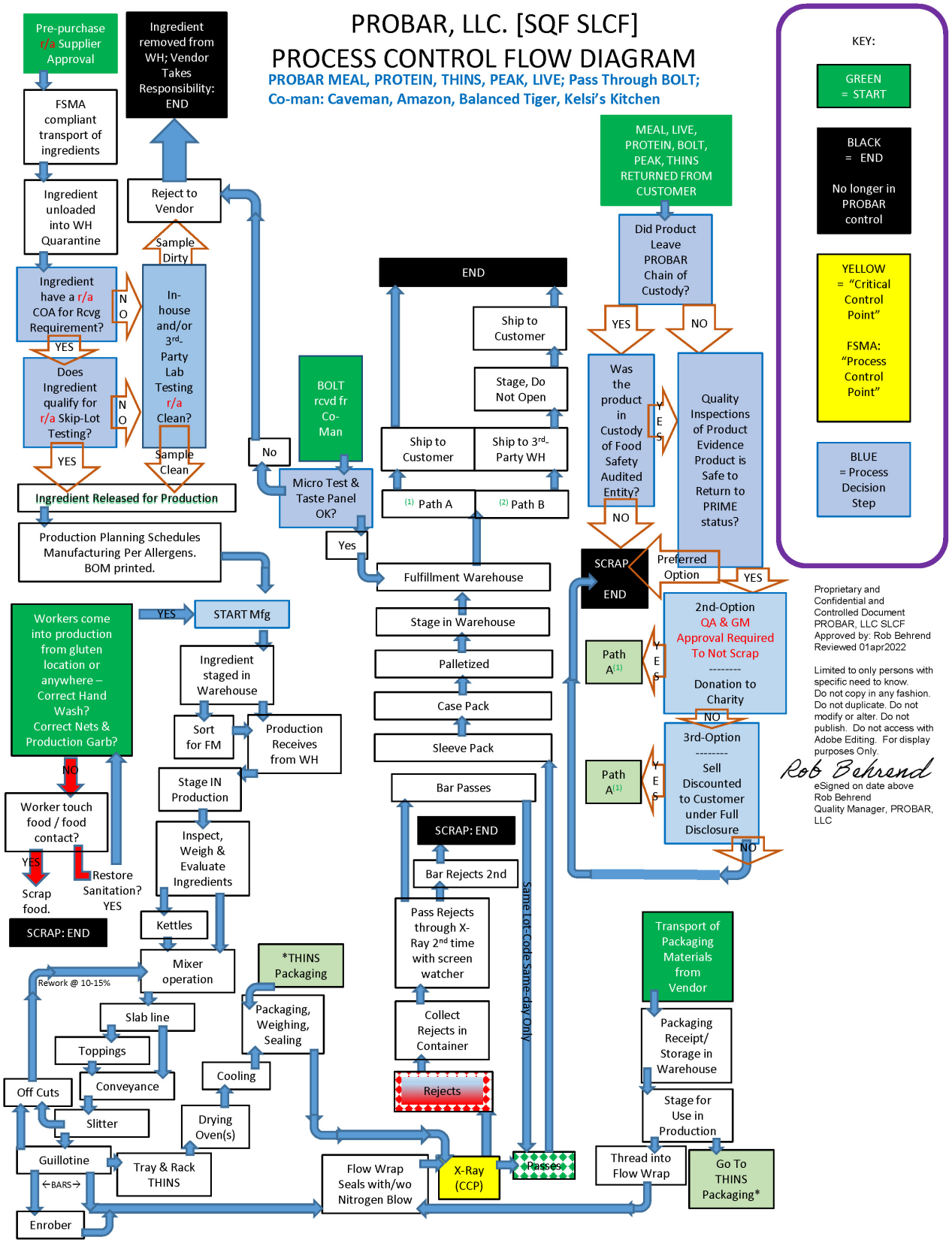

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PROBAR, LLC SLCF
Approved by: Rob Behrend
Reviewed 01apr2022

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Rob Behrend
eSigned on date above
Rob Behrend
Quality Manager, PROBAR, LLC

9CFR417.2(a)(3) SUMMARY OVERVIEW:

Physical (p)
(x) Physical hazards.
Field harvest material & Indigenous Foreign Materials
Inspection
Sorting
Sieving
Screening
Supplier CCPs
Hair (Processing)
cGMPs
Processing Damaged equipment and utensils
Colored Plastics
Inspections
Sorting
Metal
Inspections
X-Ray
Metal on Metal (CCP)
X-ray CCP

BIOLOGICAL (b)
(ii) Microbiological contamination;
L. moncytogenes
Staphylococcus aureus – Hazard, not significant, Aw
Salmonella
Pathogenic E. coli (STECs)
Bacillus cereus - Hazard, not significant, Aw
Campylobacter - Hazard, not significant, Aw

All Micros: Micro Testing
COA
Dr. Nummer "*Bacillus cereus, Campylobacter, or Staphylococcus aureus* should not warrant "significant" hazard status in ingredients or in the final product. At Aw ≤ 0.85 none of these pathogens can grow. All ingredients start at Aw ≤ 0.85 and are combined to remain ≤ 0.85 (≤ 0.65 for quality reasons). Thus neither *B. cereus* nor *S. aureus* can produce toxins throughout the shelf life of these products. I am not sure why *Campylobacter* might be highlighted for review by the FDA. It is not associated with any of the ingredients and is known to rapidly die under conditions unfavorable to its growth e.g. Aw of ≤ 0.97."

(vii) Decomposition;
Organoleptic Inspection
FIFO management
Shelf Life Studies
COA & Product Guarantee

(viii) Parasites;
Organoleptic Inspection
Supplier FDA compliant
(vi) Zoonotic diseases;
Plants
No animal ingredients unprocessed enough to allow transmission

CHEMICAL (c)
(i) (i) Natural toxins;
Nuts and Nut Products
COA; Supplier Control
(ii) (iii) Chemical contamination;
Food ingredient exceeding maximum use level
Ex: sulfites
Food Additive, Color Additive, GRAS substance
Ingredient Approval Process
LOI with sub-inputs
Chemical, Pesticide, or Residue
Reasonably unlikely to occur: see Process Authority Letter: July 8, 2018 in PC-PCP/HACCP reference files; ask Quality Manager for a copy if needed
(iii) (v) Drug residues;
Non-GMO certified ingredients
COAs
Ingredient Approval Process chemical analysis
(iv) (iv) Pesticides;
"-Unapproved colors and additives, and pesticides are hazards, but not "significant hazards requiring Supplier Preventive Controls." Dr. Brian Nummer
Continued Monitoring PreRequisite Controls:
Non-GMO certified ingredients
COAs
Ingredient Approval Process chemical analysis
FDA and Industry continual monitoring
(v) (ix) Unapproved use of direct or indirect food or color additives
"-Unapproved colors and additives, and pesticides are hazards, but not "significant hazards requiring Supplier Preventive Controls." Dr. Brian Nummer
Continued Monitoring Pre-Requisite Controls:
Certification Review:
Organic
Non-GMO
COAs
Ingredient Approval Process
chemical analysis
List of Ingredients
FDA and Industry continual monitoring

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
ONGOING MONITORING	Trends in biological, chemical, physical, process, and allergen hazards for the defined category of product will be regularly monitored via subscription to FDA/FSMA emails, consumer complaints, ingredient supplier communications, annual HACCP review by HACCP team, Auditor input and/or findings, consultant information.				No
PRODUCT TYPE: Preventative Controls for Human Food	b- L. moncytogenes b- Staphylococcus aureus b- Salmonella b- Pathogenic E. coli (STECs) b. Bacillus cereus, b- Campylobacter,	b- no	b/c/p/Process/Allergen: Imported Ingredients: Reasonably unlikely B1 –Reasonably unlikely: B. cereus, Campylobacter, S. aureus are significant hazards but not significant hazards requiring Supplier Preventative Controls, low risk (severity vs frequency) B2- Reasonably unlikely: Pathogenic E. coli B3- Reasonably unlikely: B. cereus, Campylobacter, Staphylococcus aureus	Imported Ingredients: imported ingredients are assured compliant with FDA/FSMA/Foreign Supplier Verification Program standards B1/2/3- see Process Authority Letter: July 8, 2018 in PC-PCP/HACCP reference files; ask Quality Manager for a copy if needed B2- Supplier/Ingredient approval/Supplier controls via FDA registration/FSMA compliance/Letter of Guarantee-or-COA, see files/and/or Internal Testing, see files B3- Ingredient and Finished Product Aw = <0.85 B4- L. monocytogenes: environmental controls FDA compliant program	Imported - no b - no
	c- chemical pesticide(s) or residue c- Mycotoxins/natural toxins c- Unapproved colors and/or additives c- heavy metals	c- no	C1- Reasonably unlikely to occur- chemical pesticide(s) or residue. C2- Reasonably unlikely to occur: Mycotoxins / Natural toxins, Heavy Metals, Chemical Pesticide(s) or residue C3- unapproved colors, additives, and pesticides are hazards, but not significant hazards within FSMA standard controls by suppliers (see also import above) C4- Reasonably unlikely: due to supplier controls: for Nut ingredient suppliers	C1/2/3- see Process Authority Letter: July 8, 2018 in PC-PCP/HACCP reference files; ask Quality Manager for a copy if needed C2/3: Supplier/Ingredient approval/Supplier controls via FDA registration/FSMA compliance/Letter of Guarantee-or-COA, see files C4- Letter of Guarantee or COA	c- no
	p- foreign materials from field or manufacturing process	p- no	p - Reasonably unlikely to occur- Purchasing agreements ingredients free from foreign materials per FDA foreign materials handbook. Visual inspection of trailer and packaging materials on the trailer. Warehouse management. Damaged packaging is rejected.	p- H-001r. SQF 2.3.2.3; SQF 11.6.1; SQF: 2.4.4.3 and 2.4.4.8	p- no
	Process: chemical mis-formulation Process: Pathogen survival—Salmonella, STECs	Process: no	Process1: Reasonably unlikely to occur: Environmental pathogen recontamination: Salmonella, STECs Process2: Chemical mis-formulation chemical hazards: No restricted food ingredients or additives used. Recipe compliance monitoring, see production packet	Process1: Environmental Controls, see FDA compliant Salmonella environmental monitoring/STECs see internal testing Process1/2: see Process Authority Letter: July 8, 2018 in PC-PCP/HACCP reference files; ask Quality Manager for a copy if needed	Process: no
	a-allergen from cross contamination, process error, supplier error, supplier formulation change	a- no	a – Reasonably unlikely to occur: Allergen Program; Sanitation testing Protein swabs; Warehouse controls; Ingredient receiving review of ingredients in supplier formulation (incoming goods receipt SQF 11.6.5, 11.6.6, 11.6.8)	a-H-001r. SQF 2.3.2.3; SQF 2.8.1 Allergen Management System; 2.8.1 iii: Allergen register; allergen scoops reference; SQF 11.6.1: warehouse management	a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
ALLERGEN MANAGEMENT PROGRAM RISK ANALYSIS AND CCP EVALUATION FOR ENTIRE HACCP PROCESS FLOW DIAGRAM: HACCP PLAN ALLERGEN ANALYSIS AND RESPONSE RE CCP DETAILED SUMMARY	B: no C: no P: no A: YES	B: no C: no P: no A: YES	Product Labels are verified against formula ingredients and sub-ingredients to ensure all allergens are documented on labeling for consumer information of all allergens contained in formula/recipe inside package; So not labelled allergens in food risks are: (RUTO: = Reasonably Unlikely to Occur) Hidden allergens in ingredient sub-inputs RUTO: Ingredient Approval Process; Non-GMO LOI disclosure identifies all sub-inputs; Supplier Allergen Matrix: Product, Line, Building Allergen cross contamination before delivery to PROBAR warehouse RUTO: Supplier Warranty of Product Guarantee; Trailer inspection; Damaged container reject/scrap Allergen cross-contamination inside PROBAR warehouse RUTO: Warehouse allergen controls, see allergen program document Use of wrong ingredient in formula due to PROBAR error RUTO: BOM warehouse pull for production, check, Recipe match by ingredient, Ingredient IID numbers Wrong ingredient inside packaging from supplier with possible wrong allergens to label RUTO: Organoleptic Inspection / Inspection every container Allergen cross contamination from rework across days RUTO: Rework not allowed between production days Allergen cross contamination from day's production work RUTO: Only one formula ingredients allowed on production floor at one time Allergen cross contamination from employee lunch/clothing to production RUTO: cGMP, handwashing, lab coats, gloves, dedicated lunch room Allergen cross-contamination from incorrect wash of protective production garb RUTO: Audit of wash with ATP and Protein Swabs Allergen cross contamination from inadequate sanitation leading to pre-op release of production equipment and room for day's production RUTO: Pre-Op release from Sanitation to Production required negative protein swab results across equipment, utensils, and support Operational sanitation deviation leading to allergen cross contamination RUTO: No non-formula ingredients allowed on production floor; Operational Sanitation requires rinse, chemical wash, rinse Wrong label used by PROBAR to formula manufactured RUTO: Formula Label Match program of revision number Wrong labels mixed in with good labels creating some wrong labeled finished product RUTO: Every primary package is handled during building of shelf carton; 100% inspection Wrong film imprints at start or end of film roll making finished product in wrong label RUTO: Front of spool is lost in threading; end of spool is physical inspection required by operation of machine Wrong shelf cartons mixed into case with correct shelf carton labels RUTO: Every case of shelf cartons is flipped through and inspected before placing on cartoner infeed Secondary packaging carries allergens not declared on packaging so cross contamination potential by consumer while tearing open primary packaging and touching food RUTO: cGMPs; product on floor is scrap if not immediately retrieved and wiped with alcohol wipe Finished product damage to packaging causes allergen cross contamination RUTO: Product inspection at time of picking for shipping; and trailer loading Storage conditions cause allergen change inside food? RUTO: Not physically possible		NO

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
PRE-PURCHASE RISK ANALYZE INGREDIENTS AND SUPPLIER	b-microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold, others as FDA human food guidance book indicates (B. Cereus) c- chemical pesticide residue; false ingredient; p- foreign materials from field or manufacturing process a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b –Reasonably unlikely to occur: Sample Certificates of Analysis and Sample inhouse testing documents Salmonella, Staph, General Coliforms, E. Coli, ACP, and Yeast and Mold according to AOAC and CMMEF standards. Unacceptable test results create "seller/ingredient disallowed". Aw of ingredient analyzed for purchase or reject. Aw not CCP because it is native Aw of ingredient, not artificially created Aw that is extant. Response to FDA indication to consider B. cereus identified native Aw as preventative measure. Ongoing tests of finished product and incoming goods records are kept in microlab c- Reasonably unlikely to occur- Specifications for product to be purchased, supplier history. FDA guidelines for human food. p - Reasonably unlikely to occur- Purchasing agreements ingredients free from foreign materials per FDA foreign materials handbook. Visual inspection of trailer and packaging materials on the trailer. Damaged packaging is rejected. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Possible cross contamination during supplier manufacture of ingredient or supplier sanitation failure (example: milk chocolate → chocolate); Risk Analysis pre-purchase approval and as needed, testing or COA.	b- H-001r. -2.3.2.3 c- H-001r. -2.3.2.3 p- H-001r. -2.3.2.3 a-H-001r. -2.3.2.3	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
TRANSPORT OF INGREDIENTS FROM VENDOR	b-microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b –Reasonably unlikely to occur, Aw ingredients, Process Mix, and Final Product; Certificates of Analysis with each ingredient shipment or inhouse testing documents Salmonella, Staph, General Coliforms, E. Coli, ACP, and Yeast and Mold according to AOAC and CMMEF standards. Unacceptable test results are rejected. c- Reasonably unlikely to occur- Trailer inspections for LTL loads. p - Reasonably unlikely to occur- Purchasing contracts require ingredients be free from foreign materials. Visual inspection of trailer and packaging materials on the trailer. Damaged packaging is rejected. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Possible cross contamination during supplier manufacture of ingredient or supplier sanitation failure (example: milk chocolate → chocolate); Risk Analysis pre-purchase approval and as needed, testing or COA.	b- COA from Vendor or Inhouse Testing. Ingredients with micro results too high are rejected. PRP-001, PRP-002, PRP-003. SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4 c- Q-004 compliant to 21CFR110.93. SQF 11.6.5-11.6.6 p- Sorter, Sorting, and Visual observation of product for foreign material during production. a- labelling and reject of damaged freight; Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; H-001r Ingredient Risk Analysis. SQF 2.3.2.3, SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
TRANSPORT OF PACKAGING MATERIALS FROM VENDOR	b-microbial contamination pathogens: None c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b-Reasonably unlikely to occur- stored inside containers while in transport; Damaged packaging is rejected. c- Reasonably unlikely to occur- stored inside containers while in transport; Damaged packaging is rejected p - Reasonably unlikely to occur- stored inside plastic containers while in transport. Visual inspection of trailer and packaging materials on the trailer. Damaged packaging is rejected. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process	b- PRP Q-100; GMPs; Q-004, SQF 11.6.5-11.6.6, SQF 2.4.2.1 c- Q-004, SQF 11.6.5-11.6.6 p- Q-004, SQF 11.6.5-11.6.6 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels. SQF 11.6.5-11.6.6, SQF 2.8.1,	b - no c- no p- no a- no
INGREDIENT RECEIPT INTO WAREHOUSE	b- microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b – Reasonably unlikely to occur: ingredients are stored in sealed containers in the warehouse and Personnel GMPs. ; Damaged packaging is rejected c- Reasonably unlikely to occur- Chemicals stores in non-food location and monitored by Production Supervisors; Damaged packaging is rejected p - Reasonably unlikely to occur- Food ingredients stored in sealed containers and packaging is inspected before it is taken into warehouse. Damaged packaging is rejected; Damaged packaging is rejected a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process	b- PRP-001, PRP-002, PRP-003; GMPs; Q-004, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4 c- H-011, Sanitizer Storage and Use PRP and GMP standards, SQF 2.4.2.1-2.4.2.2 p- H-012, Movement of Ingredients from Warehouse to Production. SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
PACKAGING RECEIPT INTO WAREHOUSE	b- microbial contamination pathogens: none identified at this time c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b - Reasonably unlikely to occur- stored inside containers while in storage; Damaged packaging is rejected c- Reasonably unlikely to occur- stored inside containers while in storage; Damaged packaging is rejected p - Reasonably unlikely to occur- stored inside containers while in storage. Damaged packaging is rejected. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process	b- PRP-001, PRP-002, PRP-003; GMPs; Q-004, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4 c- H-011, Sanitizer Storage and Use PRP and GMP standards. SQF 2.4.2.1-2.4.2.2 p- H-012, Movement of Ingredients from Warehouse to Production; Q-004, SQF 11.6.5-11.6.6, SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no
DOES FOOD INGREDIENT HAVE A COA FOR MICROS? YES	b- microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b - Reasonably unlikely to occur- COA certifies micros are lower than defined limits. c- Reasonably unlikely to occur :Chemical composition of food is defined prior to purchase agreement; Organoleptic inspection during incoming sample inspection; damaged packaging or evidence of container mistreatment is rejected. p - Reasonably unlikely to occur- stored inside containers while in storage. Damaged packaging is rejected. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process	b- PRP-001, PRP-002, PRP-003, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4 c- Q-004, Trailer inspection at time of receipt; Q-004; c- H-011, Sanitizer Storage and Use PRP and GMP standards. SQF 11.6.5-11.6.6, SQF 2.4.2.1-2.4.2.2 p- Q-004, Trailer inspection at time of receipt; Q-004. SQF 11.6.5-11.6.6 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
DOES FOOD INGREDIENT HAVE A COA? NO	b- microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold	b- no	b - Reasonably unlikely to occur- COA not present triggers Pre-requisite Program QA-05 requiring inhouse micro testing. Any ingredient failing tests are rejected before being used in production.	b- PRP-001, PRP-002, PRP-003, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4	b - no
	c- chemical none identified at this time	c- no	c- Reasonably unlikely to occur :Chemical composition of food is defined prior to purchase agreement; Organoleptic inspection during incoming sample inspection; damaged packaging or evidence of container mistreatment is rejected.	c- Q-004, Trailer inspection at time of receipt; Q-004; c- H-011, Sanitizer Storage and Use PRP and GMP standards. SQF 11.6.5-11.6.6, SQF 2.4.2.1-2.4.2.2	c- no
	p- foreign materials from torn / damaged packaging	p- no	p - Reasonably unlikely to occur- stored inside containers while in storage. Damaged packaging is rejected.	p- Q-004, Trailer inspection at time of receipt. SQF 11.6.5-11.6.6	p- no
	a-allergen from cross contamination or supplier error	a- no	a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process	a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	a- no
IN-HOUSE MICRO TESTING; SAMPLE DIRTY	b- microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold	b- no	b - Reasonably unlikely to occur- Any ingredient failing micro tests are rejected before being used in production.	b- PRP-001, M-004, SQF 2.3.2.3, SQF 2.5.4. SQF 2.4.8.1-2.4.8.4	b - no
	c- chemical none identified at this time	c- no	c- Reasonably unlikely to occur- Organoleptic inspection during incoming sample inspection; damaged packaging or evidence of container mistreatment is rejected.	c- Q-004, Trailer inspection at time of receipt; Q-004; c- H-011, Sanitizer Storage and Use PRP and GMP standards. SQF 11.6.5-11.6.6, SQF 2.4.2.1-2.4.2.2	c- no
	p- foreign materials from torn / damaged packaging	p- no	P - REASONABLY UNLIKELY TO OCCUR- VISUAL INSPECTION OF PACKAGING FOR ANY DAMAGE OR MISTREATMENT DURING SHIPMENT; CONTRACTS WITH SUPPLIER REQUIRES NO FMS. SOLIDS ARE SORTED AT SUPPLIER AND LATER IN PROBAR PROCESS, LIQUIDS ARE RUN THROUGH SCREENS AT SUPPLIER AND VISUALLY INSPECTED HERE.	p- Q-004, Trailer inspection at time of receipt. SQF 11.6.5-11.6.6	p- no
	a-allergen from cross contamination or supplier error	a- no	a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation.	a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
IN-HOUSE MICRO TESTING; SAMPLE CLEAN	b- microbial contamination pathogens: Salmonella, Staph, Coliforms, E.Coli, and Yeast and Mold c- chemical none identified at this time p- foreign materials from torn / damaged packaging a-allergen from cross contamination or supplier error	b- no c- no p- no a- no	b - Reasonably unlikely to occur- Inhouse testing certifies micros are lower than defined limits. c- Reasonably unlikely to occur- Organoleptic inspection during incoming sample inspection; damaged packaging or evidence of container mistreatment is rejected. P - REASONABLY UNLIKELY TO OCCUR- VISUAL INSPECTION OF PACKAGING FOR ANY DAMAGE OR MISTREATMENT DURING SHIPMENT; CONTRACTS WITH SUPPLIER REQUIRES NO FMS. SOLIDS ARE SORTED AT SUPPLIER AND LATER IN PROBAR PROCESS, LIQUIDS ARE RUN THROUGH SCREENS AT SUPPLIER AND VISUALLY INSPECTED HERE. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation.	b- PRP-002, PRP-003, M-004, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4 c- Q-004, Trailer inspection at time of receipt; Q-004; c- H-011, Sanitizer Storage and Use PRP and GMP standards. SQF 11.6.5-11.6.6, SQF 2.4.2.1-2.4.2.2 p- Q-004, Trailer inspection at time of receipt. SQF 11.6.5-11.6.6 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
WAREHOUSE-STORED FOOD INGREDIENT RELEASED FOR USE IN PRODUCTION	b-microbial contamination pathogens: Environmental Controls c- chemical none identified at this time p- foreign materials from torn / damaged packaging; warehouse debris a-allergen from cross contamination or supplier error	b-no c-no p- no a- no	B- <u>PREREQUISITE PROGRAMS</u>; LISTERIA CONTROL PROGRAM AND SALMONELLA CONTROL PROGRAM ENSURES NO PATHOGENS HAVE CONTAMINATED THE SHIPPING UNIT CONTAINER ENSURING NOT CROSS CONTAMINATION FROM WH TO PRODUCTION. C- REASONABLY UNLIKELY TO OCCUR. THERE HAS BEEN NO PREVIOUS INCIDENCES OR PLANT DOCUMENTATION OF OCCURRENCE. P - REASONABLY UNLIKELY TO OCCUR- VISUAL INSPECTION OF PACKAGING FOR ANY DAMAGE OR MISTREATMENT DURING SHIPMENT; CONTRACTS WITH SUPPLIER REQUIRES NO FMS. SOLIDS ARE SORTED AT SUPPLIER AND LATER IN PROBAR PROCESS, LIQUIDS ARE RUN THROUGH SCREENS AT SUPPLIER AND VISUALLY INSPECTED HERE. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation.	b- M-001, M-002, M-003, SQF 2.4.8.1-2.4.8.4 c- Q-004, H-012; H-011; c- Q-004, Trailer inspection at time of receipt; Sanitizer Storage and Use PRP and GMP standards. SQF 11.6.5-11.6.6, SQF 2.4.2.1-2.4.2.2 p- Q-004, H-012, X-Ray CCP down stream, Sorter, Sorting, machine for medium risk ingredients like nuts and seeds. SQF 11.6.5-11.6.6 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
MOVE INGREDIENT TO PRODUCTION	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign materials from torn / damaged packaging; warehouse debris a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work, move wrong ingredient to production.	b-no c-no p- no a- no	b - Reasonably unlikely to occur- Inhouse testing certifies micros are lower than defined limits. GMP handling of containers. c- Reasonably unlikely to occur: Cleaning for Organic Production requires a zero residue; SSOP Preoperational Testing evidences there is no allergen cross contamination. Testing for residual sanitizer ensures no contamination from sanitizer. p - Reasonably unlikely to occur- Visual inspection at time of movement to production. Any warehouse debris is removed prior to staging of container in production; visual inspection of packaging for any damage or mistreatment during WH storage; Contracts with supplier requires no FMs. Solids are sorted at supplier and later in PROBAR process, Liquids are run through screens at supplier and visually inspected at PROBAR. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Lot code tracking and ingredient match to recipe	b- PRP-001, PRP-002, PRP-003, M-004; SSOP "NFC" Tables, SQF 2.3.2.3, SQF 2.5.4, SQF 2.4.8.1-2.4.8.4, c- SSOP "NFC" Tables; S-015 Sanitizers; H-011, SQF 2.4.2.1-2.4.2.2, SQF 2.4.8.1-2.4.8.4, p- Q-004, H-012. SQF 11.6.5-11.6.6 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
SORT ALL DRY INGREDIENTS, VISUALLY INSPECT LIQUIDS AND NUT BUTTERS DURING HANDLING, HAND SORT PACKED DRIED FRUITS & SIMILAR	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material; possible indigenous or extraneous harvest or processing material: colored plastic, hard nuts/seeds, hair, a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work, move wrong ingredient to production.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- GMPs, Handwashing, Clothing, Gloves, and SSOP prevent micro contamination. c- Reasonably unlikely to occur: Cleaning for Organic Production requires a zero residue and we test and record that count. p - Reasonably unlikely to occur- Ingredient specifications require no foreign materials in ingredients. Ingredients are further processed through a Sorter, Sorting, is solid, an inspection conveyor system if solid, hand sorted if packed fruits, and visually inspected if liquid or nut butter, to ensure ingredients are free from foreign materials. On-going visual inspection during each step of product being physically handled also makes foreign materials in finished product reasonably unlikely to occur. X-ray CCP requires a ceramic, metal and glass seed which also works to find extranaeous foreign material from field harvest & packing and inhouse handling. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Lot code tracking and ingredient match to recipe	b- Q-100 GMPs; SSOP "NFC" Tables, SQF 2.4.2.1 c- S-015 Sanitizers; H-011, SQF 2.4.2.1-2.4.2.2, SQF 2.4.8.1-2.4.8.4, p- H-012 movement from WH to Prod; 100% Inspection of ingredients; H-016 sorting; X-Ray CCP down stream. SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
BAR MANUFACTURE FOOD HANDLING; WEIGH INGREDIENTS, KETTLES, MIX/MIXERS, SLAB LINE, TOPPING, CONVEYANCE, SLITTER, GUILLOTINE, ENROBER, COOLING TUNNELS;	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from internal process; metal shaving a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- SOPs and SSOP ensures clean product contact surfaces and environment. GMPs ensure safe handling practices. Kettles are not a lethality, temperatures are in growth range, sugar concentrations are very high, so no risk of bacterial growth. Stabilization is minutes when added to mixing bowl with ambient solids. No bacterial growth risk. Aw of ingredients and mixture is below 0.7Aw, no risk of bacterial growth. Temperature increases and stabilization does not cause bacterial stasis and pathogen due to Sugar concentration, short stabilization, and Aw in mix. No opportunity. Rework does not heat again. c- Reasonably unlikely to occur- Cleaning for Organic Production requires a zero residue and we test and record that count. p - Reasonably unlikely to occur- GMPs control Hair, metal shavings from metal on metal mixing are X-ray detectable as well as GMP inspected, GMPs control no jewelry on production floor or false finger nails or shedding clothing material or hair adornments, etc. Pumps on enrober risk metal shavings which will be X-ray detected in mass. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Same Lot Code work, no lot code cross over, no risk of non labeled allergens, GMP for handwashing and no food in production; scheduling of finished product based on H-008a	b- S-015 Sanitizers; SSOP; Q100 GMPs; SSOP, SQF 2.4.2.1 Dr, Nummer consulting document on file c- S-015 Sanitizers; H-011, SQF 2.4.2.1-2.4.2.2, SQF 2.4.8.1-2.4.8.4, p- H-012 movement from WH to Prod; 100% Inspection of ingredients; X-Ray CCP downstream; production GMP and training, SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
THINS ONLY FOOD HANDLING / MANUFACTURING; THINS: Drying ovens, Cooling MANUFACTURE BAR	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from internal process; metal shaving a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- SOPs and SSOP ensures clean product contact surfaces and environment. GMPs ensure safe handling practices. Ovens are not a lethality, temperatures are in growth range, Aw is <0.70 so no risk of bacterial growth. Oven is an additional drying step. Stabilization is not a risk of micro growth due to Aw. No bacterial growth risk. Temperature increases and stabilization does not cause bacterial stasis and pathogen due to Aw. No opportunity. There is no rework. c- Reasonably unlikely to occur- Cleaning for Organic Production requires a zero residue and we test and record that count. p - Reasonably unlikely to occur- GMPs control Hair, metal shavings from metal on metal mixing are X-ray detectable as well as GMP inspected, GMPs control no jewelry on production floor or false finger nails or shedding clothing material or hair adornments, etc. Pumps on enrober risk metal shavings which will be X-ray detected in mass. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Same Lot Code work, no lot code cross over, no risk of non labeled allergens, GMP for handwashing and no food in production; scheduling of finished product based on H-008a	b- S-015 Sanitizers; SSOP; Q100 GMPs; SSOP, SQF 2.4.2.1 Dr, Nummer consulting document on file c- S-015 Sanitizers; H-011, SQF 2.4.2.1-2.4.2.2, SQF 2.4.8.1-2.4.8.4, p- H-012 movement from WH to Prod; 100% Inspection of ingredients; X-Ray CCP downstream; production GMP and training, SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no
PACKAGING WEIGHING SEALING FLOW WRAP SEALS WITH/WO NITROGEN BLOW	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from internal process; metal shaving, a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- SOPs and SSOP ensures clean product contact surfaces and environment. GMPs ensure safe handling practices. c- Reasonably unlikely to occur- Cleaning for Organic Production requires a zero residue and we test and record that count. p - Reasonably unlikely to occur- GMPs control Hair, plastic zips are large and can be found during mixing and handling, twist ties are X-ray rejectable, metal shavings from metal on metal mixing are X-ray detectable as well as GMP inspected, GMPs control no jewerly on production floor or false finger nails or shedding clothing material or hair adornments, etc. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Same Lot Code work, no lot code cross over, no risk of non labeled allergens, GMP for handwashing and no food in production; scheduling of finished product based on H-008a	b- S-015 Sanitizers; SSOP; Q100 GMPs; SSOP, SQF 2.4.2.1 c- S-015 Sanitizers; H-011, SQF 2.4.2.1-2.4.2.2, SQF 2.4.8.1-2.4.8.4, p- 100% Inspection of bars; X-Ray CCP down stream. a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
STAGE PACKAGING FILM FOR USE IN PRODUCTION	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from storage damage or personnel a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- Film sealed in packaging during storage. c- Reasonably unlikely to occur- Film sealed in packaging during storage p - Reasonably unlikely to occur- GMPs control Hair, GMPs inspected gloves and garb., GMPs control no jewelry on production floor or false finger nails or shedding clothing material or hair adornments, etc. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Same Lot Code work, no lot code cross over, no risk of non labeled allergens, GMP for handwashing and no food in production; scheduling of finished product based on H-008a	b- PRP Q-100; GMPs, SQF 2.4.2.1 c- H-011, Sanitizer Storage and Use PRP, SQF 2.4.2.1-2.4.2.2 p- H-012, Movement of Ingredients from Warehouse to Production. SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no
THREAD FILM INTO FLOWWRAPPER TO PACKAGE PRODUCT	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from torn packaging a-allergen from cross contamination or supplier error or inhouse allergen cross over during open food work.	b-no c-no p- no a- no	b- Reasonably unlikely to occur- Film sealed in packaging during storage. GMPs for handling keeps film clean. c- Reasonably unlikely to occur- Cleaning for Organic Production requires a zero residue and we test and record that count. Using the wrong wrapper could create a labeling allergen concern for consumer. p - Reasonably unlikely to occur- On-going visual inspection for any foreign materials during each step of product being physically handled makes foreign materials in finished product reasonably unlikely to occur. Visual inspection. a – packaged containers protected from outside allergens; packaged ingredients labeled with allergens, undamaged packaging matches labeling. Damaged packaging is rejected before receipt. Lot codes are tracked through entire production process. Organoleptic evaluation. Same Lot Code work, no lot code cross over, no risk of non labeled allergens, GMP for handwashing and no food in production; scheduling of finished product based on H-008a	b- PRP Q-100; GMPs, SQF 2.4.2.1 c- Approved Labels Book in production for reference for label match. Book maintained by Director of Operations and Quality Assurance Engineer. p- H-012, Movement of Ingredients from Warehouse to Production. SQF 11.6.1-11.6.8 a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6. SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
PACKAGER WRAPS FILM AROUND BAR AND SEALS PACKAGE	b-microbial contamination pathogens: none c- chemical none identified at this time p- foreign material from torn packaging a-allergen from cross contamination or supplier error or inhouse label mismatch, or inhouse allergen cross over during open food work; or wrong ingredient mismatch with formula&label, or hidden allergen in ingredients not labeled.	b-no c-no p- no a- yes	b- Reasonably unlikely to occur- Film sealed in packaging during storage. GMPs for handling keeps film clean. c- Reasonably unlikely to occur- Cleaning for Organic Production requires a zero residue. p - Reasonably unlikely to occur- On-going visual inspection for any foreign materials during each step of product being physically handled makes foreign materials in finished product reasonably unlikely to occur. Contracts with Suppliers and verified GMPs at supplier. Broken film causes machine to stop production so visual inspection. a – sealed containers/packaging of ingredients and packaging protected from outside allergens; packaged ingredients labeled with allergens and matched against controls; undamaged packaged raw materials match specified formula scheduled. Damaged packaging is rejected before receipt/ before use. Lot codes are tracked through entire production process. Organoleptic evaluation to ensure correct ingredients as well as label checking against recipe; Same Lot Code only rework, no lot code cross over allowed; finished product packaging lists allergens per recipe packaged, Real-time label match to formula is done for rolls of film and for boxes of shelf cartons. Printer/supplier error of wrong labels in wrong boxes—not a risk due to visual check of every box of cartons, see production floor requirement Control Point. GMP for handwashing and no food in production; scheduling of finished product based on Allergen Matrix (H-008a;	b- PRP Q-100; GMPs, SQF 2.4.2.1 c- H-011, Sanitizer Storage and Use PRP, SQF 2.4.2.1-2.4.2.2 p- Rolls are stored in plastic bags until placed on the flow-wrap machine. Sides of rolls are inspected for foreign materials before use. A - Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs and training; Production documentation of lot codes and ingredient match to recipe and Formula Label match to recipe; scheduling of finished product based on H-008a. SQF 11.6.5-11.6.6, SQF 2.8.1	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
NITROGEN IS BLOWN INTO SLEEVE OF PRODUCT DISPLACING O_2 TO 2.5% O_2 AND THIS IS NOT A FOOD SAFETY ACTION, THIS IS QUALITY FUNCTION	b-microbial contamination pathogens Listeria c- chemical: Oils from Air Compressor feeding N2 injector p- foreign material none identified at this time a-allergen from cross contamination or equipment error or inhouse allergen cross over during open food work that may get into system.	b-no c-no p- no a- no	b- FDA control programs for Listeria and Salmonella cite air compressors as possible source of Listeria. All bars manufactured by Probar, LLC. is Nitro-packed to 2.5% oxygen or less. Listeria can survive in low O2 envirnments. c- Filters on N2 injector air compressors are between 5microns and 0.2 microns. Oil will not pass these filters. p - Reasonably unlikely to occur- filters on system can filter out dust and moisture and micros. Sanitation SOP for cleaning injection tip same as all food contact. a - Reasonably unlikely to occur- Tanks are in separate room, no contact with open food area, filters on system can filter out dust and moisture and micros	b- Listeria and Salmonella requires, respectively, Aw levels above 0.90 and 0.93. Chapters 44-45, The Microbiological Safety and Quality of Food, Vol II. Probars have Aw levels of 0.68 and lower. c- ATP testing of air blow from N2 injector tip has never producted a reading greater than 0RLU. No contaminates are passing the filters. p- Filters on N2 injector air compressors are between 5microns and 0.01microns. Foreign Materials will not pass these filters. a- Filters on N2 injector air compressors are between 5microns and 0.01microns. Foreign Materials will not pass these filters.	b - no c- no p- no a- no
OPERATOR CONFIRMS NITROPAK	b-microbial contamination c- chemical none identified at this time p- foreign material none identified at this time a- none	b-yes c-no p- no a- no	b- Reasonably unlikely to occur- Tested sample is scrapped c- Reasonably unlikely to occur- Tested sample is scrapped p - Reasonably unlikely to occur- Tested sample is scrapped a- Tested sample is scrapped	b- Tested sample is scrapped c- Tested sample is scrapped p- Tested sample is scrapped a- Tested sample is scrapped	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
HEAT SEAL CLOSES AND SEALS NITROGEN INSIDE THE PACKAGE BY SEALING BOTH ENDS OF THE PACKAGING AROUND THE BAR	b-microbial contamination: none c- chemical: none p- foreign material none a- allergen: none	b-yes c-no p- no a- no	b- Reasonably unlikely to occur- due to closed system and SSOP c- Reasonably unlikely to occur- due to closed system and SSOP p - Reasonably unlikely to occur- due to closed system and SSOP a- Reasonably unlikely to occur- due to closed system and SSOP	b- bars damaged by heat seal are scrapped. Hand packaging of bars into sleeve of 12 bars is 100% inspection. c- bars damaged by heat seal are scrapped. Hand packaging of bars into sleeve of 12 bars is 100% inspection. p- bars damaged by heat seal are scrapped. Hand packaging of bars into sleeve of 12 bars is 100% inspection. a- bars damaged by heat seal are scrapped. Hand packaging of bars into sleeve of 12 bars is 100% inspection. Closed system.	b - no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
FINISHED PACKAGE PASSES THROUGH X-RAY MACHINE PAQUETE TERMINADO PASA A TRAVÉS DE LA MÁQUINA DE RAYOS X	b-microbial contamination pathogens none b-patógenos de contaminación microbiana b ninguno c- chemical none c- ninguno químico p- foreign material: metal on metal p- material extraño: metal sobre metal a-allergen: none a- alergeno: ninguno a-	b-no/no c-no/no p-yes/Si a- no/no	b- Reasonably unlikely to occur- bar is sealed in finished package / Razonablemente poco probable que ocurra, la barra está sellada en el paquete terminado c- Reasonably unlikely to occur- bar is sealed in finished package / Razonablemente poco probable que ocurra, la barra está sellada en el paquete terminado p – Possible: metal on metal scraping, also stainless steel nuts bolts/ Posible: raspado de metal sobre metal, también pernos de tuercas de acero inoxidable a-Reasonable unlikely to occur due to allergen prevention up to this process step / Es poco probable que ocurra debido a la prevención de alérgenos hasta este paso del proceso	b- bar is sealed in finished package / la barra está sellada en el paquete terminado c bar is sealed in finished package / la barra está sellada en el paquete terminado p- A functional and calibrated X-ray machine is required for each individual food bar/packet inside its primary packaging. For limits, measures, process, corrective actions, monitoring, verification, and validation, see "CCP-1 Matrix", included at the end of this document. / Se requiere una máquina de rayos X funcional y calibrada para cada barra/paquete de alimentos dentro de su envase primario. Para los límites, las medidas, el proceso, las acciones correctivas, el seguimiento, la verificación y la validación, véase la "Matriz CCP-1", incluida al final de este documento. a- Same lot code, no risk of cross contamination: a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs / Mismo código de lote, sin riesgo de contaminación cruzada: a- Q-004; H-008; H-008a; Lista maestra de ingredientes; Etiquetas de ingredientes; GMP	b - no c- no p- YES / Si a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
X-RAY REJECT: YES	b-microbial contamination pathogens none c- chemical none identified at this time p- foreign material: X-ray detectable a- allergen: none	b-no c-no p-yes a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably likely to occur- X-ray Machine has detected possible hazards and eliminated them—underweight bars are also rejected, as well as overweight bars and false rejects consistent with statistical analysis of X-ray detection. a- Reasonable unlikely to occur due to allergen prevention up to this process step	b- bar is sealed in finished package c- bar is sealed in finished package p- Maintain X-ray rejects in known staging container a- Same lot code, no risk of cross contamination: a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs, SQF 11.6.5-11.6.6, SQF 2.8.1	b – no c- no p- no a- no
BARS ARE SORTED THROUGH X-RAY A SECOND TIME	b-microbial contamination pathogens none c- chemical none identified at this time p- foreign material: X-ray detectable a- allergen: none	b-no c-no p-yes a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably likely to occur- X-ray Machine has detected something to trigger rejection. a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed.	b- bar is sealed in finished package c- bar is sealed in finished package p- Bars are passed through X-ray a second time to investigate weight rejects vs false rejects vs food-hazard rejects. Food Hazard rejects are destroyed. a- Same lot code, no risk of cross contamination: a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs. Packages are sealed. SQF 11.6.5-11.6.6, SQF 2.8.1	b – no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
BARS NOT REJECTED A SECOND TIME	b-microbial contamination pathogens none c- chemical none identified at this time p- foreign material: X-ray NOT detectable a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably likely to occur- X-ray Machine does detect foreign material to trigger rejection. First rejection sometimes is caused by reasons other than food hazard. Second pass of reject product at same X-ray settings will detect Foreign Material but weights reject is turned off. Bars not rejected a second time are classified as CCP-compliant and prime for market sale. Absence of consumer complaints about foreign materials supports this action. a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed.	b- bar is sealed in finished package c- bar is sealed in finished package p- bars are run through X-ray a second time at controlled rates. Bars rejected are scrapped. Bars not rejected are CCP-compliant and Prime for market distribution. a- Same lot code, no risk of cross contamination: a- Q-004; H-008; H-008a; Master Ingredient List; Ingredient Labels; GMPs, SQF 11.6.5-11.6.6, SQF 2.8.1	b – no c- no p- no a- no
X-RAY REJECT: NO	b-microbial: none c- chemical: none p- physical: none a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably unlikely to occur- X-ray Machine detects no reason to reject bar. a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed.	b- bar is sealed in finished package c- bar is sealed in finished package p- bar is sealed in finished package a- bar is sealed in finished package	b - no c- no p- no a- no
PACKAGED BAR PLACED INTO SLEEVE	b-microbial: none c- chemical: none p- physical: none a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably unlikely to occur- bar is sealed in finished package a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed. Formula Label Match and tracking through day on production paper work for any none recipe sleeve packaging to be never in production room.	b- bar is sealed in finished package c- bar is sealed in finished package p- bar is sealed in finished package a- bar is sealed in finished package	b – no c- no p- no a- no

PROCESS STEP	HAZARD B-BIOLOGICAL C-CHEMICAL P-PHYSICAL A-ALLERGEN	REASONABLY LIKELY TO BE A FOOD SAFETY HAZARD	JUSTIFICATION FOR DECISION	CONTROL MEASURES TAKEN TO PREVENT A SIGNIFICANT HAZARD	IS THIS STEP A CCP?
SLEEVE IS SHRINK-WRAPPED AS FINISHED PRODUCT	b-microbial: none c- chemical: none p- physical: none a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably unlikely to occur- bar is sealed in finished package a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed. Formula Label Match and tracking through day on production paper work for any none recipe sleeve packaging to be never in production room.	b- bar is sealed in finished package c- bar is sealed in finished package p- bar is sealed in finished package a- bar is sealed in finished package	b – no c- no p- no a- no
FINISHED PRODUCT IS STACKED ON PALLET FOR WAREHOUSE STAGING FOR SHIPMENT	b-microbial: none c- chemical: none p- physical: none a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably unlikely to occur- bar is sealed in finished package a- Reasonable unlikely to occur due to allergen prevention up to this process step, Packages are sealed. Formula Label Match and tracking through day on production paper work for any none recipe sleeve packaging to be never in production room.	b- bar is sealed in finished package c- bar is sealed in finished package p- bar is sealed in finished package a- bar is sealed in finished package	b – no c- no p- no a- no
FINISHED PRODUCT IS SHIPPED TO DISTRIBUTION AGAINST SALES ORDER	b-microbial: none c- chemical: none p- physical: none a- allergen: none	b-no c-no p- no a- no	b- Reasonably unlikely to occur- bar is sealed in finished package c- Reasonably unlikely to occur- bar is sealed in finished package p - Reasonably unlikely to occur- bar is sealed in finished package a- Reasonable unlikely to occur due to allergen prevention up to this process step. Warehouse management system recognizes finished product in respect to ordered product, no possible mix up of wrong product pulled for shipping. Shipment is double checked by second warehouse person.	b- bar is sealed in finished package c- bar is sealed in finished package p- bar is sealed in finished package a- bar is sealed in finished package	b – no c- no p- no a- no

PROBAR	PROBAR·SALT·LAKE·CITY·FACILITIES·(SLCF)·190·N.·Apollo·Rd;·Salt·Lake·City,·UT·84116·USA	LOCATION:
NUMBER: 2.4.3.12	POLICY:	ISSUE·DATE·/·REVISION·NUMBER: 22sep2021	SUPERCEDES: 28sep2020
SUBJECT: CCP·Matrix·English		Page·1·of·1
Approved by: Rob·Behrend		

CCP/PCP-1·:·HACCP/HARPC·PROCESS·PLAN·X-RAY

Critical Control Point (CCP)	*Significant Hazard(s) (C-B-P-A)*	*Critical Limits*	*Monitoring Procedures*				*Corrective Action*	*Monitoring Records*	*Verification / Validation*
			What	How	Frequency	Who			
CCP-1 **PCP-1:** X-Ray·product·for·Physical·Hazard,·likely:·Metal·from·equipment;·shavings;·nuts.	C-None· B-None P-·Physical·Hazard·from·possible·Metal-on-Metal·pieces. Customer·Requirements·call-out·the·monitoring·of·Ferrous·and·Non-Ferrous·metals·so·for·customer·requirements,·these·two·are·also·added·to·the·Stainless·Steel·called·out·by·risk·analysis. A:·None	**CCP:** **Stainless·Steel·—·1.0·mm·(see·seed·for·type·of·Stainless·Steel)** **NOT**·CCP/PCP—but·Control·Point—CP: Hazard·Analysis·does·not·identify·glass·or·ceramic·as·likely·to·occur.·The·X-ray·is·able·to·see·the·following·seeds,·so·SLCF·chooses·to·add·them·to·our·monitoring: Glass·—·2.5·mm Ceramic·—·3.0·mm Pending·Review·and·Purchase. Ferrous·Steel· ~~Tbd~~·by·process·authority Non-Ferrous·Steel·–·~~tbd~~·by·process·authority	X-Ray·manufacturer·supplies·a·"Seed"·of·the·defined·material·(see·"Critical·Limit"·and·labeling·on·the·plastic·card)·glued·into·an·X-ray·neutral·plastic·card.· There·are·three·plastic·cards,·one·stainless·steel·seed,·one·glass·seed,·one·ceramic·seed.	Using·the·supplier·certified·(size·and·material)·seed·cards·bearing·the·name·of·the·supplier—attach·each·seed·to·one·bar.··Place·the·seed·at·the·thickest·part·of·the·food·bar·and·attach·with·tape·so·the·seed·can·not·come·off·the·bar;·or·onto·the·nut·butter·packet·so·it·can·not·come·off·the·packet.··Feed·that·bar·or·packet,·with·the·attached·seed,·to·the·X-Ray·infeed·conveyor·belt. Feed·one·bar·or·packet·at·a·time·in·the·normally·moving·stream·of·product.··The·seed·must·reject.··If·the·seed·does·not·reject·automatically,·go·to·corrective·actions·and·do·what·is·required·there. This·passing·of·each·of·three·seeds·individually·through·the·X-Ray·Machine·will·be·repeated·for·a·total·of·three·passes·through·the·X-ray·for·each·monitoring·check.	Pre-Production:·before·product·starts·running·through·X-ray,·a·start-up·test·will·be·documented·evidencing·the·X-Ray·is·stable·for·that·production·run·product—this·is·designed·to·eliminate·risk·of·PCP/CCP·deviations·during·production·runs.··The·first·bars·manufactured·will·be·used·to·set·up·the·monitoring·and·confirm·lot·code·product·is·correctly·examined·and·rejected·3/3·times·for·each·identified·seed.·· When·this·is·completed,·the·CCP·is·then·functional·and·production·product·may·run·through·the·benefit·of·the·functioning·X-ray·CCP Production·Frequency: COSTCO·Contract·requires·that·X-ray·Monitoring·be·conducted·at·least·every·120·minutes·so·per·customer·requirements:·**CCP·monitoring·is·115·minutes**	CCP-/-PCP-trained·equipment·operators	If·metal·seed·test·does·not·reject·one·time·during·Monitoring·Procedure·do·the·following: 1. → Stop·Production. 2. → Note·and·document·the·time; 3. → Adjust·the·sensitivity·of·the·X-ray·as·may·be·needed·to·correctly·detect·the·CCP·seed; 4. → Re-monitor·seed(s),·if·CCP·detects·and·rejects·3x·minimum,·you·may·restart·production·flow. 5. → Call·QA·to·review·incident 6. → Work·with·Supervisor·to·capture·product·from·finished·pallet·for·last·good·check·to·restart·time.·· 7. → Quarantine·that·product·on·a·HOLD·pallet·to·be·re-processed·through·a·functional·and·monitored·CCP. 8. → Document·on·your·CCP·paperwork 9. → Call·QA·to·review·incident 10. → Call·Production·Manager·/·Supervisor·to·review·incident **If**·adjusting·X-ray·does·not·resolve·the·failure·to·reject·the·seed: 11. → Do·not·restart·production; 12. → Contact·Production·Manager·and·Quality·immediately·to·help·resolve; 13. → QA·or·production·manager·will·document·on·CCP·paperwork All·Hold·product·must·be·run·through·functional·CCP·per·HOLD·disposition·by·Quality·Manager. Consult·with·QA·each·time·about·whether·or·not·it·is·required·to·Establish·measures·to·prevent·any·pattern·of·recurrence; Prevent·Distribution·of·Deviation·affected·product·(last·good·check·to·next·good·check)·until·it·has·been·run·through·a·functioning·PCP·1. If·failure·to·reject·is·other·than·machine·or·food·mass·drift,·Documentation·will·be·addressed·as·defined·in·9·CFR·Section·417.3·operator·MUST·contact·QA·immediately·before·restarting·production. See·monitoring·record·on·"Packaging·Control·Chart"..·See·daily·production·packet.	X-Ray·Monitoring·Tracking·Sheet Filed·at·end·of·day·in·daily·production·packet.	**Verification** QA,·Production·Supervisor,·QA·Rep.,·Other·HACCP·trained·Monitor,·or·Production·Lead·will·verify·PCP·1·at·least·once·per·shift.·Sign·daily·verification·sheet. **Validation** Manufacturing·Technician·will·validate·the·X-Ray·once·per·year·or·more·frequently·if·the·X-Ray·Machine·or·its·parts·are·replaced. QA·will·compare·Consumer·Complaints·against·X-Ray·food·Safety·Claims·to·ensure·no·food·hazard·requires·additional·evaluation.··CC·trending·will·be·this·documentation QA·and·production·will·engage·in·a·longitudinal·study·of·an·increased·monitoring·frequency·once·a·year·to·confirm·Process·Authority·recommendation·of·monitoring·check·1x/day

PLAN verifying & validating

PLAN VERIFICATION AND VALIDATION

See document: 2.5.2 Verification Activities: Line Item: X-ray

DOCUMENTATION

X-RAY PCP-1 PRODUCTION-PACKAGE SHEET

See Document: Production Package: X-ray monitoring record

HARPC PCP-1 / CCP DEVIATION REPORT

PRO BAR	LOCATION: PROBAR SALT LAKE CITY FACILITIES (SLCF) 190 N. Apollo Rd; Salt Lake City, UT 84116 USA	
NUMBER POLICY **2.4.3.14**	ISSUE DATE / REVISION NUMBER: **01apr2022**	SUPERCEDES: 10apr21
TITLE:: **HACCP CCP-1 Deviation**		**Page 1 of 2**
Approved by: Rob Behrend		

Deviation Response:

Deviation #: ddmmmyy-#/dd

Date	Name	9CFR §417.3(a)

(1) The cause of the deviation is identified and eliminated because:

(2) The CCP (will be) is under control (after the) because this corrective action is (taken) now done:

(3) Measures to prevent recurrence are (established) now in place and they are:

(4) No product that is injurious to health or otherwise adulterated as a result of the deviation (will) can enter commerce because:

Probar, LLC.; controlled document; Form 2.4.3.1 CCP-1 Deviation Report, SQF 8.1/FSMA Compliant