



SQF Food Safety Audit Edition 9

Health-Ade, LLC - Health-Ade, Torrance

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
27941 | 160410

AUDIT RATING



Good

DECISION DATE
10/07/2022

AUDIT TYPE
RECERTIFICATION

RECERTIFICATION DATE
08/06/2023

AUDIT DATES
08/23/2022 - 08/25/2022

EXPIRATION DATE
10/20/2023

ISSUE DATE
10/07/2022

Facility & Scope

Health-Ade, LLC (52071)

Health-Ade, Torrance
2012 Abalone Ave
Unit A
Torrance, CA 90501
United States

Food Sector Categories:

16. Ice, Drink, and Beverage Processing

Products:

Kombucha

Scope of Certification:

Manufacturing of kombucha

Certification Body & Audit Team

SCS Global Services

2000 Powell St.
Suite 600
Emeryville, CA 94608
United States

Web Site: <http://www.scsglobalservices.com>

CB#: CB-1-SCS

Accreditation Body: ANSI

Accreditation Number: 0821

Lead Auditor: Davis, David (202516)

Technical Reviewer: Sztabowski, Jacek (9892)

Hours Spent on Site: 25.5

Hours of ICT Activities: 0

Hours Spent Writing Report: 8

Non-Conforming

2.4.3 Food Safety Plan (Mandatory)

The "Food Safety Plan" has been developed, implemented and maintained by the site. The Food Safety Plan is kept electronically and maintained using an on site server. The validation of the Process Flow Charts has electronic signatures with a June 15, 2022 date. The Food Safety Plan has been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained, with documentation found on the cover page of the Food Safety Plan." The Plan includes a list of all products in the scope of the certification, a complete product description, intended product use (including vulnerable populations) and flow diagrams for each process, including all input and output steps in the process. The process flow has been verified by the site per actual inspection of the site and processes. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. Critical Control Points have been identified as pasteurizer operational parameters (CCP 1) and a food safety screens presence (CCP2). Critical Limits for the CCP 1 (pasteurization parameters are defined for temperature and flow rate) and CCP2 (screen integrity). The CCPs are monitored and verified in the Food Safety plan on a per batch timing. Any deviations found in monitoring of established control limits are documented and investigated, with proper disposal of involved products. The plan is verified as part of the SQF System and are reviewed annually or when changes occur, by the food safety team with the last review date on June 15, 2022. The CCP verifications are documented in the Krones Production spread sheet. The CCP monitoring for June 23, 2022 and July 29, 2022 were reviewed during the audit. Minor 2.4.3.8 -The process authority letter does not define the pathogenic organisms of concern for the product and requires that the water activity be greater than 0.85.

- 2.4.3.8** The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

RESPONSE: MINOR

EVIDENCE: The process authority letter does not define the pathogenic organisms of concern for the product and requires that the water activity be greater than 0.85.

ROOT CAUSE: The previous process authority did not provide guidance on the pathogens of concerns or further details for the requirements of monitoring water activity for a beverage product. We have now partnered with a new process authority to improve our current PA Letter. The project will include a review of the current PA Letter, raw materials, finished goods specification, processing steps, the identification of pathogenic organisms of concern and the need for the monitoring of water activity in our beverage product line.



Health-Ade - Mutual
NDA - signed.pdf

CORRECTIVE ACTION: We have partnered with a new process authority to improve our current PA Letter. The project will include a review of the current PA Letter, raw materials, finished goods specification, processing steps, the identification of pathogenic organisms of concern and the need for the monitoring of water activity in our beverage product line.



Health-Ade - Mutual
NDA - signed.pdf

VERIFICATION OF CLOSEOUT: A new process authority has been contracted to create a Process Authority letter for the company.

COMPLETION DATE: 09/02/2022 **CLOSEOUT DATE:** 09/30/2022

2.7.2 Food Fraud (Mandatory)

The site has conducted a Food Fraud Vulnerability Assessment , dated July 29, 2022 that includes the methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to substitution, finished product mislabeling, dilution, and counterfeiting. Instructions have been provided to all relevant staff by means of training in the Food Fraud Program The Vulnerability Assessment and Mitigation Plan were last reviewed on June 10, 2022, form SOP 105. Minor 2.7.2.2 - The site does not have a defined food fraud mitigation program for ingredients that would be defined having a higher risk.

2.7.2.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

RESPONSE: MINOR

EVIDENCE: The site does not have a defined food fraud mitigation program for ingredients that would be defined having a higher risk.

ROOT CAUSE: The consideration for the mitigating steps against high-risk items has been included in the program. I was originally missing because Health-Ade does not have any high-risk items at this time.



QM 2.7.2 Food Fraud
10.4.2022.docx

CORRECTIVE ACTION: The Food Fraud program now defines steps to mitigate higher risk items.



QM 2.7.2 Food Fraud
10.4.2022.docx

VERIFICATION OF CLOSEOUT: The food fraud program has been updated and includes actions to be taken if a mitigation is required.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 10/05/2022

2.9.2 Training Program (Mandatory)

The site has implemented a training program, entitled QM 2.9.2 dated May 9, 2022, which covers the necessary competencies for plant personnel. This program requires training to be conducted in implementing HACCP, CCP Monitoring, Personal Hygiene, GMPs, Sampling and Test Methods, Environmental Monitoring, Allergen Management, and other tasks identified as critical to meeting the effective implementation of the SQF code. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering Food Defense, HACCP, GMPs and interviews with the first shift Quality technician and filler operator, it was evident the proper refresher training has been conducted to ensure food safety and the SQF system are maintained. Specific refresher training topics are covered on an annual basis. The training language and materials are in English and Spanish, the languages used in the operation and understood by all plant personnel. Training records reviewed included the participant name, skills description, description of training, date of training, trainer, and training verification. Minor 2.9.2.1 - The environmental swabbing training has not been documented.

2.9.2.1 A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

RESPONSE: MINOR

EVIDENCE: The environmental swabbing training ha not been documented.

ROOT CAUSE: The annual refresher training schedule for the staff was not performed due to marking the item as completed on the training matrix. Upon further review of the training documents, that specific training was not performed. To prevent this from reoccurring, the training matrix will be monitored at least annually against the training records to verify that trainings were not marked as complete in error on the training matrix. The program document has been updated to include this verification.



QM 2.9 Training
9.16.2022.docx



DOC091622.pdf

CORRECTIVE ACTION: The environmental swabbing training was documented on 9/2/2022. Please see attached document.



DOC091622.pdf

VERIFICATION OF CLOSEOUT: The training document register was included in the corrective action showing that the Quality personnel responsible for the environmental swabbing was completed on September 2, 2022.

COMPLETION DATE: 09/02/2022 **CLOSEOUT DATE:** 10/05/2022

11.1.2 Building Materials

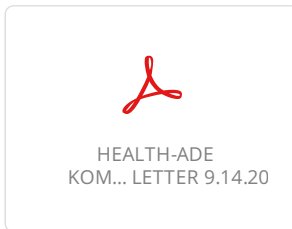
Floors are constructed of concrete that has epoxy coatings in the fermentation room and batching rooms. The floor under the filler is also coated with epoxy. The floors are properly graded for effective drainage to trench drains in wet areas. Waste water trap systems meet the US Plumbing code and are located away from food handling areas. Wastewater during the audit was observed to be properly discharged. The trench drains were located and constructed for ease of cleaning and inspection. Walls and ceilings in the fermentation and blending rooms are constructed of white enamel painted insulated panels that were found to be in good repair. These areas were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. The site does not have any overhead drain lines. All waste piping is below the floors. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of white enamel coated insulated panels, which are easily cleaned and prevent product contamination. Minor 11.1.2.8 - The area above the batching and fermentation rooms does not have a pest monitoring program.

11.1.2.8 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

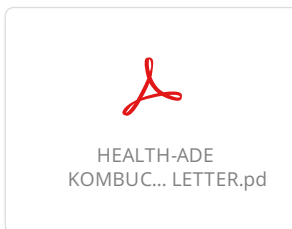
RESPONSE: MINOR

EVIDENCE: The area above the batching and fermentation rooms does not have a pest monitoring program.

ROOT CAUSE: The pest monitoring of this area of the building was not originally considered during the risk assessment for the design of our facility pest control program. We have now committed to inspect this area on a quarterly basis. Attached is the addendum to the program.



CORRECTIVE ACTION: Pest monitoring of this area of the building is now included in our pest control program. Attached is the update to our program.



VERIFICATION OF CLOSEOUT: The pest management program has been updated to include quarterly inspections of the areas above the blending and kombucha rooms.

COMPLETION DATE: 09/14/2022 **CLOSEOUT DATE:** 09/30/2022

11.2.3 Calibration

A policy, QM 11.2.10 dated May 9, 2022 defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented. Equipment is calibrated against national or international standards. A procedure to address the disposition of any affected product should inspection equipment be found to be out of calibration, is defined on page 2 of the QM 11.2.10 document. Inspection and testing equipment is protected from damage or unauthorized use by location and in some cases by shrouding. The facility has developed a calibration schedule for all devices listed. This documentation is QMR 190-BP dated July 18, 2022 that is used for the documentation of the quality instruments. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. A review of the calibration records for Ohaus CS5000 scale May 2, 2022 by US Calibrations and a weight set that has weights from 5 kg serial number 9913 that was conducted on May 3, 2022 by US Calibration confirms the schedule is being followed. The maintenance calibrations are recorded on QMR 190. Minor 11.2.3.6 - The calibration program for maintenance does not include the calibrations for the flow meters, conductivity meters, and pressure gauges.

11.2.3.6 A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

RESPONSE: MINOR

EVIDENCE: The calibration program for maintenance does not include the calibrations for the flow meters, conductivity meters, and pressure gauges.

ROOT CAUSE: The master calibration register did not include all of the required assess on the list. The resister has been review and updated to include the onsite temperature probes and flow meters. Attached is the updated register.



QMR 190-BP and
Torrance M... 9.16.20

CORRECTIVE ACTION: The calibration program has been updated to include the facility flow meters and conductivity meters. Attached is the updated register.



QMR 190-BP and
Torrance M... 9.16.20

VERIFICATION OF CLOSEOUT: The site has updated the calibration program and now includes the flow meters, conductivity probes, pressure gauges that are used to control the pastuerizer.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

11.6.2 Cold Storage, Freezing and Chilling of Foods

Cold storage trailers are used to store finished product under refrigeration until the point of shipment. Temperature monitoring methods are defined in QM 11.6, on page 2. The temperatures of the trailers are recorded on the Shift QA on line check once per shift. NA 11.6.2.1 -2 - The site does not have refrigerated storage areas in the facility and utilizes refrigerated trailers for all refrigerated storage. Minor 11.6.2.3 - The program does not define who and when the refrigerated trailer temperatures are to be recorded. Temperatures are monitored once per shift by Quality Assurance but the procedure only states that warehouse personnel perform a temperature check. NA 11.6.2.4 - All refrigerated storage is on trailers. The site has no dedicated refrigerated storage areas.

11.6.2.3 The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: MINOR

EVIDENCE: The program does not define who and when the refrigerated trailer temperatures are to be recorded. Temperatures are monitored once per shift by Quality Assurance but the procedure only states that warehouse personnel perform a temperature check.

ROOT CAUSE: The program did not accurately reflect the identified staff members that the perform the temperature monitoring task. This oversight was not identified during the annual program reviewed. The program has been updated with the correct information.



QM 11.6 Loading
Tra... Practices.docx

CORRECTIVE ACTION: The program was updated to accurately reflect the appropriate persons who perform the temperature monitoring of the trailers.



QM 11.6 Loading
Tra... Practices.docx

VERIFICATION OF CLOSEOUT: The site has updated the temperature monitoring program and now includes the temperatures and the teams responsible for the monitoring of temperatures and when.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

11.6.5 Loading, Transport, and Unloading Practices

A policy defining the practices for loading, unloading and storage of food products has been documented and implemented in document QM 11.6. It was observed during the audit tours that food is unloaded, stored and loaded under conditions that prevent cross contamination. The site's policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading and that vehicles be secured from tampering by use of seal or other agreed method. Trailer inspection records were reviewed for July 25, 2022 and June 23, 2022. Trailers and vehicles used for transport were observed to be properly secured from tampering by a the use of seals. The seal numbers are recorded on the load maps. Refrigerated trailer set temperatures are checked at the beginning of the loading and checked at the end of loading with a IR temperature gun. This was observed to be recorded for product shipped on June 23, 2022 and July 26, 2022. It is the responsibility of the carrier to maintain the required temperatures during transport to the final destination. Refrigeration unit temperatures are monitored and recorded before opening the trailer doors. Product temperatures are recorded at appropriate intervals during the unloading. Temperatures were reviewed for July 27, 2022 and found to be properly recorded. Warehouse interviews with the warehouse supervisor revealed that employees are aware of the proper procedures and follow them. It was observed that unloading practices are designed to prevent product contamination. Minor 11.6.5.5 - The program does not define the required temperatures for the refrigerated products in the procedure but the temperatures are recorded on the load map and meet refrigerated temperature ranges.

11.6.5.5 Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

RESPONSE: MINOR

EVIDENCE: The program does not define the required temperatures for the refrigerated products in the procedure but the temperatures are recorded on the load map and meet refrigerated temperature ranges.

ROOT CAUSE: The program did not accurately identify the required temperatures for the refrigerated products in the procedure. This oversight was not identified during the annual program reviewed. The program has been updated with the correct information.



QM 11.6 Loading
Tra... Practices.docx

CORRECTIVE ACTION: The program was updated to accurately define the required temperatures for the refrigerated products.



QM 11.6 Loading
Tra... Practices.docx

VERIFICATION OF CLOSEOUT: The temperatures specifications are defined for the frozen and refrigerated products in the procedure update. The temperatures align with industry standards for the refrigerated and frozen materials and products.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

| Audit Statements | |
|-------------------------------|--|
| SQF Practitioner Name | Name the designated SQF Practitioner RESPONSE: Lizabeth Reyes |
| SQF Practitioner Email | Email of the designated SQF Practitioner RESPONSE: lreyes@health-ade.com |
| Opening Meeting | People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Ander McCarthy: VP of Manufacturing, Ryan Walker: Maintenance Manager, Lizabeth Reyes: Quality Assurance Manager, Erik Rojas: Production Manager, Sheril Bravo: Quality Assurance Supervisor, Adrian Torres: Director of Engineering, David Davis: Auditor |
| Facility Description | Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details) RESPONSE: The facility is in a single building that is 60,000 square feet in size. The building is constructed of tilt up concrete walls and a flat membrane roof on steel trusses. The facility has 40 employees working on two shifts starting at 6:00 AM to 2:30 PM and second shift starts at 2:30 PM until 11:00 PM. The site has separate rooms for the blending and fermentation operations with the filler and packaging equipment inside one large room. The site has minimal warehouse space and ships product from the line to an off site warehouse. SQF Edition 9: FSC: 16. Ice, Drink, and Beverage Processing Products: Kombucha 1 HACCP Plan |
| Closing Meeting | People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Ander McCarthy: VP of Manufacturing, Ryan Walker: Maintenance Manager, Lizabeth Reyes: Quality Assurance Manager, Erik Rojas: Production Manager, Sheril Bravo: Quality Assurance Supervisor, Adrian Torres: Director of Engineering, David Davis: Auditor |
| Auditor Recommendation | Auditor Recommendation RESPONSE: Recertification to the SQF Food Safety Edition 9 program |

| Section Responses | |
|-------------------|---|
| 2.1.1 | <p>Management Responsibility (Mandatory)</p> <p>The site has a food safety policy statement, called "Food Safety and Quality Policy" dated April 4, 2022 that senior management has implemented. It is signed by a senior manager, Vice President of Manufacturing. The Policy statement covers a commitment to supply safe food, establish and maintain food safety culture, establish and continually improve the food safety management system, and comply with all customer and regulatory requirements. The Food Safety culture plan includes communication of food safety objectives and performance measures. The Policy is communicated to the facility's staff with postings and training, in English and Spanish. The policy was observed to be posted in the Lunch Room. Senior management has developed the following food safety objectives; Food Safety Audit Score of >86%, 100% Investigation of incidences of ill health or injury, >99.9% compliance with microbiological criteria, no major GMP non-conformances, 100% compliance with the release of food safety and quality complaint product for sale, 100% compliance with product released into the marketplace that complies with relevant Specification, and reduction of customer complaints by 10% year over year. These have been effectively communicated to all relevant staff through annual training and during the monthly reviews of the performance reviews. Performance of defined food safety objectives is reviewed during the monthly management meeting by relevant staff. Plant staff is required to report food safety issues to management, as evidenced by policy 211-4 and interviews with Filler Operator and the Quality Technician. An organizational chart, dated April 4, 2022 outlines the structure of staff having responsibility for food safety as well as backups for key personnel. Job descriptions for key personnel were reviewed for Production Manager, Quality Manager, General Operations Manager, and the Maintenance Manager and appeared to be adequate. It was observed through observation and documentation that site management has provided adequate resources through staffing that meet defined food safety objectives. Quality Manager is the designated primary SQF Practitioner, is a full time employee of the facility and has a HACCP food safety training course, as evidenced by a certificate from FSPCA dated February 11, 2019. Quality Supervisor is the designated substitute SQF Practitioner, is a full time employee of the facility and has a HACCP food safety training course, as evidenced by a certificate from Food HACCP dated September 19, 2019. The SQF Practitioner is responsible for the development, implementation and maintenance of the SQF System. Senior site management has processes in place to demonstrate continuous improvement and to ensure the integrity of the food safety systems when there are organizational or personnel changes.</p> |

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel.

RESPONSE: COMPLIANT

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

2.1.1.3 The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

2.1.1.4 Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System; ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

2.1.1.5 The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code; Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

RESPONSE: COMPLIANT

2.1.1.6 Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

2.1.1.7 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.1.8 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

RESPONSE: COMPLIANT

2.1.2 Management Review (Mandatory)

The SQF System is reviewed annually by the site's Management Review Team with the last review documented and completed on June 27, 2022. The review includes changes to the food safety management system documentation (policies, procedures, specifications, and food safety plans); food safety culture performance; food safety objectives and performance; corrective and preventive actions and trends related to internal audits, external audits, customer complaints, verification and validation activities; hazard and risk management system; and follow up actions from previous management review. The SQF Practitioner has updated senior site management on a monthly basis, by means of management review meetings and through presentations on any matters that impact the site's SQF System. Monthly management meetings dated August 8, 2022, May 4, 2022 and April 29, 2022 were reviewed and appeared to be adequate.

- 2.1.2.1** The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

- 2.1.2.2** The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

RESPONSE: COMPLIANT

2.1.3 Complaint Management (Mandatory)

The site's written Complaint policy is found in the document QM2.1.3 dated April 18, 2022. It defines the methods and responsibilities for handling food safety customer, commercial, and authority complaints and has been implemented. The site records the complaint investigations on form QMR-018. The investigation of complaints is handled by Customer Service Team, with corrective actions and records kept of each complaint and resolution. Records of complaints were reviewed for August 22, 2022 for tight caps, August 19, 2022 for off taste, and June 16, 2022 for off taste and showed that investigation and corrective actions of the complaints had been put into place. Trending graphs of complaints for high torques from January 2022 to June 2022 were also reviewed during the audit.

- 2.1.3.1** The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

RESPONSE: COMPLIANT

- 2.1.3.2** Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

- 2.1.3.3** Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

RESPONSE: COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

A food safety manual has been developed and is maintained in hard copy, and electronic versions are saved on a server. The document is titled QM 2.2.1, and is dated April 18, 2022 and maintained by Quality Manager. The food safety manual contains the scope of the certification, a list of products in the scope, the organizational chart and food safety policies, programs and procedures that make up the site's SQF System. It is made available to all relevant staff by means of the electronic distribution and team trainings.

- 2.2.1.1** The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

RESPONSE: COMPLIANT

- 2.2.1.2** Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

The site has implemented its policy called QM 2.2.3.1 dated April 18, 2022 defining the methods and responsibilities for document control. All staff have access to current requirements and instructions by means of the server program. The document directory is Archived Documents Table 2.2.3.1

- 2.2.2.1** The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

The site has implemented its policy for verifying, maintaining, and retaining records found in the document called QM 2.2.2 dated April 18, 2022. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage, and have documented retention times. Records are retained for 5 year(s) in the computer files and for paper documents. The Quality Manager is responsible for the records program.

- 2.2.3.1** The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

RESPONSE: COMPLIANT

- 2.2.3.2** All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed.

RESPONSE: COMPLIANT

- 2.2.3.3** Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

RESPONSE: COMPLIANT

2.3.1 Specification, Formulation and Realization

The policy defining the methods and responsibilities for designing and developing new product formulations and converting product concepts to commercial realization, called QM 2.3.1 dated April 18, 2022, has been implemented. Procedures conducted at the facility include checking formulations and processes with production trials, shelf-life trials, and product testing. Shelf-life trials are conducted to establish "best by" dates, handling & storage requirements, and microbiological criteria. The food safety plan is validated and verified for each new product and process by management review defined in stage 5 of the process. This review includes changes to distribution and ingredients. The facility maintains records of all steps of the product development cycle including process development, shelf-life trials and facility trials. The records for development of new product "Citrus Immune Boost" were reviewed and found to contain a trial on July 18 2022, microbiological and analytical chemistry analysis, and production on August 1, 2022. Shelf life testing was conducted during the R&D development defined in stage 3 of the process. The site has a commercialization team that is composed of R&D VP, Quality Manager, Production Manager and Plant Manager.

- 2.3.1.1** The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

RESPONSE: COMPLIANT

- 2.3.1.2** New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

RESPONSE: COMPLIANT

- 2.3.1.3** A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety.

RESPONSE: COMPLIANT

- 2.3.1.4** Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

RESPONSE: COMPLIANT

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| 2.3.1.5 | <p>The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.1.6 | <p>Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2 | <p>Specifications (Raw Material, Packaging, Finished Product and Services)</p> <p>A policy defining the methods and responsibilities for developing, managing, and approving raw material, finished product, and packaging specifications has been documented and implemented in QM 2.3.2 dated July 22, 2022. The Quality Assurance Manager is responsible for the management of the specification program. Specifications for raw materials, packaging, ingredients, additives, chemicals and processing aids have been documented. Specifications for Lime juice, Draco Passion Flower extract, and the Glass bottles used as the primary packaging were reviewed and found to be current. Raw and packaging materials are verified to ensure product safety, regulatory requirements and fit for purpose requirements are met. These are done by means of COA review, technical specification review, 3rd party audit reviews, Organic and kosher certifications and the completion of a Questionnaire (form QMR 014). Letters of Guarantee are on file from packaging suppliers for the bottles, closures, and boxes. Approved suppliers are required to notify the site of changes in product composition that could have an impact on product formulations. This is documented in QM 2.3.2 on page 4. Food contact glass bottles and plastic closures has a certificate of conformance from Berlin Distribution indicating that it does not present a risk of chemical migration to food products. Product labels are approved by the Commercialization team (R&D, sales, marketing, Operations) who is qualified to ensure they are accurate and meet regulatory requirements. Descriptions of services provided by all contract service providers having an impact on food safety are documented in "Master Contact and Service Provider Support List." A list of current contract service providers is maintained on the company server, and found to include providers of services including Krones Equipment, CCI chemical suppliers, Pest Control, Water System, US Calibration, and Food Micro Labs. Contract arrangements for Pest Control (Assured Pest Management dated July 14, 2022) and Evoqua Water Systems (dated July 10, 2018)were reviewed during the audit and found to be satisfactory. Finished product specifications are current, documented, and approved by the site and its customers. Specifications include microbiological limits, analytical chemical limits (pH and Brix), physical limits (volume), composition (flavor profile and sensory determination), labeling, packaging requirements, and storage requirements (refrigerated storage below 40° F). Finished product specifications for Bubbly Rose, Pink Lady Apple, and Ginger Lemon (all kombucha products) were reviewed during the audit and contained the required information. Specifications for raw materials, packaging materials, chemicals, processing aids, contract services, and finished products are reviewed on an annual basis with the last documented review taking place on March 7, 2022.</p> |
| 2.3.2.1 | <p>The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.2 | <p>Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.3 | <p>All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.4 | <p>Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.5 | <p>Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).</p> <p>RESPONSE: COMPLIANT</p> |
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| 2.3.2.6 | <p>Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.7 | <p>Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.8 | <p>Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.9 | <p>Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.2.10 | <p>Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.3 | <p>Contract Manufacturers</p> <p>The methods and responsibility for ensuring all agreements with contract manufacturer relating to food safety, customer product requirements, realization, and delivery has been documented and implemented in QM 2.3.3 dated April 18, 2022. A documented risk assessment for contract manufactured product has been documented in Co- Manufacturer Risk Management Questionnaire that was completed on July 26, 2021 for Full Spectrum Bottling. The Co manufacturer has GFSI certification through BRC with an expiration date of November 2, 2022. Changes to contracts are agreed to between the co-manufacturer and the site management. Records of audits have been maintained for the manufacturer of Health Ade Pop (5 flavors).</p> |
| 2.3.3.1 | <p>The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.3.2 | <p>The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.3.3 | <p>Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.3.3.4 | <p>Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
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2.3.4 Approved Supplier Program (Mandatory)

The site has a written supplier approval policy in QM 2.3.4 dated April 25, 2022 which has been implemented and covers the procedures for selecting, evaluating, approving, and monitoring suppliers of raw materials, ingredients, and packaging materials. Approved supplier performance and status is reviewed using the form QM 14 questionnaire along with the review of supporting documentation. The policy includes a review of the specifications of products, the supplier's food safety controls, procedures for granting and monitoring approved suppliers, the level of risk of products to the site and details of requirements for Certificate of Conformance, Certificates of Analysis and testing. A register (QMR 2.3.2) is maintained of all current approved suppliers and their emergency contact information, which was reviewed during the audit and found to be acceptable. Raw materials: tangerine juice, orange juice, and passion fruit were verified to have come from suppliers on the Approved Supplier List with documentation to confirm risk level of those ingredients and monitoring requirements. The procedures for emergency use of non-approved suppliers have been documented in QM 2.3.4 in section 5.4. Supplier audits are not conducted by the company but 3rd party GFSI audits for ingredients are required. Packaging that is of a food contact nature are required to have a 3rd party annual inspection. The records for ingredient and packaging audits are on file.

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

RESPONSE: COMPLIANT

- 2.3.4.2** The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

- 2.3.4.3** Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

RESPONSE: COMPLIANT

- 2.3.4.4** The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

RESPONSE: COMPLIANT

- 2.3.4.5** Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

RESPONSE: COMPLIANT

- 2.3.4.6** Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

The site has ensured that products delivered to its customers comply with regulatory requirements in the country of use. Regulatory compliance for this operation includes Food Safety programs, Allergen controls, and nutritional labeling. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of IFT and SCS, and FDA. The site has a written provision that SCS Global Services, the certification body, and SQFI will be notified within 24 hours if a food safety event requiring public notification occurs as defined in section 4 of QM 2.4 dated April 18, 2022. The Quality and R&D departments are responsible for the management of the program.

- 2.4.1.1** The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

RESPONSE: COMPLIANT

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| 2.4.1.2 | <p>The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.1.3 | <p>SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.2 | <p>Good Manufacturing Practices (Mandatory)</p> <p>The property, buildings and equipment are located, constructed and designed to ensure food is manufactured in a safe, hygienic environment. The site has written and implemented those Good Manufacturing Practices applicable to the scope of this certification documented in QM 2.2.1. These food safety pre-requisite programs are found in QM 2.2.1.</p> |
| 2.4.2.1 | <p>The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.2.2 | <p>The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3 | <p>Food Safety Plan (Mandatory)</p> <p>The "Food Safety Plan" has been developed, implemented and maintained by the site. The Food Safety Plan is kept electronically and maintained using an on site server. The validation of the Process Flow Charts has electronic signatures with a June 15, 2022 date. The Food Safety Plan has been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained, with documentation found on the cover page of the Food Safety Plan." The Plan includes a list of all products in the scope of the certification, a complete product description, intended product use (including vulnerable populations) and flow diagrams for each process, including all input and output steps in the process. The process flow has been verified by the site per actual inspection of the site and processes. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. Critical Control Points have been identified as pasteurizer operational parameters (CCP 1) and a food safety screens presence (CCP2). Critical Limits for the CCP 1 (pasteurization parameters are defined for temperature and flow rate) and CCP2 (screen integrity). The CCPs are monitored and verified in the Food Safety plan on a per batch timing. Any deviations found in monitoring of established control limits are documented and investigated, with proper disposal of involved products. The plan is verified as part of the SQF System and are reviewed annually or when changes occur, by the food safety team with the last review date on June 15, 2022. The CCP verifications are documented in the Kronos Production spread sheet. The CCP monitoring for June 23, 2022 and July 29, 2022 were reviewed during the audit. Minor 2.4.3.8 - The process authority letter does not define the pathogenic organisms of concern for the product and requires that the water activity be greater than 0.85.</p> |
| 2.4.3.1 | <p>A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.2 | <p>The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.3 | <p>The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.</p> <p>RESPONSE: COMPLIANT</p> |

- 2.4.3.4** Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

RESPONSE: COMPLIANT

- 2.4.3.5** The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

RESPONSE: COMPLIANT

- 2.4.3.6** The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

RESPONSE: COMPLIANT

- 2.4.3.7** The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

- 2.4.3.8** The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

RESPONSE: MINOR

EVIDENCE: The process authority letter does not define the pathogenic organisms of concern for the product and requires that the water activity be greater than 0.85.

ROOT CAUSE: The previous process authority did not provide guidance on the pathogens of concerns or further details for the requirements of monitoring water activity for a beverage product. We have now partnered with a new process authority to improve our current PA Letter. The project will include a review of the current PA Letter, raw materials, finished goods specification, processing steps, the identification of pathogenic organisms of concern and the need for the monitoring of water activity in our beverage product line.



Health-Ade - Mutual
NDA - signed.pdf

CORRECTIVE ACTION: We have partnered with a new process authority to improve our current PA Letter. The project will include a review of the current PA Letter, raw materials, finished goods specification, processing steps, the identification of pathogenic organisms of concern and the need for the monitoring of water activity in our beverage product line.



Health-Ade - Mutual
NDA - signed.pdf

VERIFICATION OF CLOSEOUT: A new process authority has been contracted to create a Process Authority letter for the company.

COMPLETION DATE: 09/02/2022 **CLOSEOUT DATE:** 09/30/2022

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| 2.4.3.9 | <p>The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.10 | <p>Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.11 | <p>For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.12 | <p>The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.13 | <p>The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.14 | <p>The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.15 | <p>Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.16 | <p>Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.3.17 | <p>Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4 | <p>Product Sampling, Inspection and Analysis</p> <p>The site's procedures and criteria for sampling, inspecting and analyzing raw materials, work-in-progress and finished product have been documented and implemented in QM 2.4.4 dated April 11, 2022. All analyses are conducted to nationally recognized standards or by an equivalent validated method. On site laboratory personnel conducting product and/or environmental testing participate in annual proficiency testing, the last of which was conducted on August 15, 2022 for pH and Brix. An onsite analytical chemical testing for brix and pH is conducted on the processing floor and is located away from operations and open product does not pose a product safety risk. All microbiological testing is conducted by contract service providers off site per SOP 394 for testing. Product evaluation and testing records were reviewed for Strawberry Glow from June 23, 2022, Pink Lady Apple from July 25, 2022, and Ginger Lemon from July 29, 2022 during the audit and found to be conducted per procedures.</p> |

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| 2.4.4.1 | <p>The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4.2 | <p>Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4.3 | <p>On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4.4 | <p>Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4.5 | <p>Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelflife of the product.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.4.6 | <p>Records of all inspections and analyses shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.5 | <p>Non-conforming Materials and Product</p> <p>The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in document QM 2.4.6 dated April 25, 2022, which were found to be properly implemented in the facility. Methods to segregate, identify, handle and dispose of product include the use of colored hold tags and the lock out from the Warehouse Management System were observed to minimize any inadvertent use. Nonconforming products or equipment is identified, segregated or disposed of, with records maintained by QMR 011. This was observed during the audit by a review of QMR 011 Log for items: turmeric extract (lot number 88917) and basil extract (lot number 201233). Relevant staff is aware of the site's Hold policy, as evidenced by interviews with Quality Supervisor and Quality Manager.</p> |
| 2.4.5.1 | <p>The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.5.2 | <p>Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.4.6 | <p>Product Rework</p> <p>NA 2.4.6.1 - The site does not rework product.</p> |

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

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not rework product.

2.4.7 Product Release (Mandatory)

The site has written procedures, QM 2.4.8 dated April 25, 2022, implemented for releasing finished products. These release procedures include ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety controls have been met. The procedure (SOP 356) also includes a requirement to confirm product labels comply with all regulatory requirements of the country of manufacture and Canada of use. The facility utilizes a positive release method based on a review of the process controls and analytical results on a per batch basis. A review of records for product releases for Strawberry Glow from June 23, 2022, Pink Lady Apple from July 25, 2022, and Ginger Lemon from July 29, 2022 during the audit showed they had been conducted per procedures. The Quality Department is responsible for the release of finished product.

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

RESPONSE: COMPLIANT

- 2.4.7.2** Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

RESPONSE: COMPLIANT

- 2.4.7.3** In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

The site has implemented a risk-based environmental monitoring program, which is described in the document called SOP 256. The environmental testing program is the responsibility of the Quality Manager. The environmental sampling and testing program includes environmental swabbing of for sites defined as zones 2 and 3. The environmental testing is specific for Enterobacteriaceae with the testing quarterly basis for 4 zone 2 sites and 3 zone 3 sites. The site has not had environmental positives for the past 2 years. The program has a response protocol if a positive test is detected in section 7 of the SOP 256. The site tracks and trends all environmental monitor results and reports the results on Table Environmental Results. Records of trending from January 2022 through June 2022 were reviewed and found to be complete (the site does monthly testing but only requires quarterly testing). Preventive measures were implemented for any identified trends.

- 2.4.8.1** A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

- 2.4.8.2** An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

RESPONSE: COMPLIANT

- 2.4.8.3** Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness (Mandatory)

The methods, responsibilities and criteria for ensuring the effectiveness of all applicable elements of the SQF Program have been documented and implemented in QM 2.5 dated April 11, 2022. The methods applied confirm that each element has been deemed effective. Methods to ensure that procedure or process changes are still effective in controlling food safety are in place and documented in program QM 2.5. Critical food safety limits are re-validated at least annually (conducted June 15, 2022) per review of the process authority review and the Food Safety Plan. Records of all verifications of effectiveness and validations are maintained by the Quality Manager. GMP validation was reviewed per a risk assessment that was conducted June 6, 2022 (Form QM 2.4.2.1).

- 2.5.1.1** The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

The methods, responsibilities and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and legality of certified products has been documented and implemented in QM 2.5.2 dated April 22, 2022. The site has established a verification schedule, documented as "Annual Verification 2022" outlining the verification frequency and responsibilities for each verification activity. The schedule is found in QM 2.5.2 and maintained by the Quality Assurance Manager. Records of verification of monitoring activities including environmental monitoring and product processing documents are reviewed by Quality Management.

- 2.5.2.1** The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

RESPONSE: COMPLIANT

- 2.5.2.2** A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

The site's Corrective and Preventative Action program is written in QM 2.5.5 dated May 9, 2022. The program describes the methods and responsibilities for investigating, resolving and managing corrective actions. The site uses a "Corrective Action Request Form" to document the corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Records of investigations and corrective actions were reviewed for an equipment calibration rejection on July 21, 2021, water testing results non compliance from July 8, 2021, label winding low pressures from July 26, 2022, and August 3, 2022 for label print quality issues. These were found to have reviews, investigations, corrective and preventative actions and resolutions documented. The Quality Manager is responsible for the management of the corrective action program.

- 2.5.3.1** The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

- 2.5.3.2** Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Internal Audits and Inspections (Mandatory)

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document QM 2.5.4 dated May 9, 2022. The Internal Audit Program is maintained by the Quality Assurance Manager. All applicable SQF Code requirements were reviewed and the compliance to the SQF Edition 9 checklist was conducted between April 4, 2022 and June 27, 2022. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventive actions by means of management review meetings. This was last completed on June 27, 2022. Personnel conducting audits have been properly trained and where practical, audit areas independent of their job function. The Quality Manager was formally trained in 2019 and had in house training conducted on June 17, 2022. Facility and equipment inspections are conducted monthly to ensure Good Manufacturing Practices are followed. Records of internal audits were reviewed for the August 5, 2022 GMP Inspection on form QMR 031, the Glass and Brittle Plastics Inspection from August 15, 2022 on form QMR 030, and a site security food defense assessment checklist form August 15, 2022. A review of the records show GMP audits are completed monthly. Objective evidence was observed to be included in records of internal audits.

- 2.5.4.1** The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

- 2.5.4.2** Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

- 2.5.4.3** Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

A policy defining how products are identified from receipt through production and shipping has been documented in QM 2.6.1 dated May 9, 2022. The site's identification system ensures all raw materials, ingredients, packaging materials, work-in-progress, process inputs and finished goods are clearly identified at all stages of their process. Items are marked at receipt by the Warehouse Receivers. Product identification records were reviewed during the audit for Strawberry Glow from June 23, 2022, Pink Lady Apple from July 25, 2022, and Ginger Lemon from July 29, 2022 during the audit and demonstrated the products were properly identified throughout the process. Product startup/changeover procedures during packing, ensure that the correct product goes into the correct package with the correct label. A changeover from Bubbly Rose to Pink Apple was observed on the plant floor and was approved and signed off by the Quality Assurance Supervisor.

- 2.6.1.1** The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

- 2.6.1.2** Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

RESPONSE: COMPLIANT

2.6.2 Product Trace (Mandatory)

A policy defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back). This is written in SOP 251 dated September 30, 2020. The effectiveness of the trace system is conducted at least annually, as part of the product withdrawal and recall program. Records of the receipt, use and dispatch of finished product are maintained.

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

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

The site has a Recall Plan defining the methods and responsibilities for withdrawing and recalling product if necessary, documented on QM 2.6.3 dated May 9, 2022. A recall team has been designated and is led by the Vice President of Manufacturing. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities, and other essential bodies. This includes SQFI and SCS Global Services, the Certification Body, who must be notified within 24 hours in writing of any food safety event requiring public notification. Investigation into the root cause of any product recall, mock recall or product withdrawal, with actions taken, was observed to be documented. Mock trace exercises are completed annually, one step forward and one step back, to verify the effectiveness of the system. Records were reviewed of the recall plan and summaries of the trace exercises performed for Bubbly Rose 12 pack code dated BRC21092202 on September 22, 2021, showing 100% accountability for the finished product. The mock recall included a raw material of organic rose petals, lot 03rr38502, with the results showing compliance. The mock trace exercise records reviewed showed the Product Withdrawal and Recall procedures were tested back one step and forward one step with acceptable accountability.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.4 Crisis Management Planning

The site's written Crisis Management Plan is found in document QM 2.6.4 dated April 11, 2022. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The Vice President of Manufacturing has oversight of the Plan and a Crisis Management team has been identified and trained as evidenced by the training record dated July 13, 2022. The Plan includes responses to a business interruption, isolating and identifying affected product and a current crisis alert list. The Crisis Management Plan includes internal/external communications and sources of legal and expert advice. A test of the plan was conducted on October 4, 2021 involving an evacuation drill for a potential fire threat that affected the food safety of the site's products. Records are maintained in on a paper document, including observations and recommendations for follow-up corrective actions for the Crisis Management Plan.

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

RESPONSE: COMPLIANT

- 2.6.4.2** The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

The site has conducted a food defense threat assessment, dated June 17, 2022 that identifies potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident. The site used the US Department of Agriculture Food Safety and Inspection Service industry self assessment checklist for Food Security. The site has a Food Defense Plan, QM 2.7 dated June 17, 2022, based on the threat assessment in which the methods, responsibilities, and criteria for preventing deliberate food adulteration have been documented and implemented. A food defense protocol includes the name of the senior manager responsible for food defense, Quality Manager, methods to allow access to the site only for authorized personnel, designated access points, the secured storage of materials, and hazardous chemicals and the control of access to contractors and visitors. Instructions have been provided to all relevant staff by means of training that was conducted four times on June 8, 2022, June 16, 2022 (two times), and June 17, 2022. The threat assessment and prevention plan is required to be reviewed at least annually with the last review documented on June 17, 2022. The Food Defense Plan was last tested and challenged on June 10, 2022 with records reviewed.

- 2.7.1.1** A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

RESPONSE: COMPLIANT

- 2.7.1.2** A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

RESPONSE: COMPLIANT

- 2.7.1.3** Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

- 2.7.1.4** The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

2.7.2 Food Fraud (Mandatory)

The site has conducted a Food Fraud Vulnerability Assessment , dated July 29, 2022 that includes the methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to substitution, finished product mislabeling, dilution, and counterfeiting. Instructions have been provided to all relevant staff by means of training in the Food Fraud Program The Vulnerability Assessment and Mitigation Plan were last reviewed on June 10, 2022, form SOP 105. Minor 2.7.2.2 - The site does not have a defined food fraud mitigation program for ingredients that would be defined having a higher risk.

- 2.7.2.1** The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

RESPONSE: COMPLIANT

- 2.7.2.2** A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

RESPONSE: MINOR

EVIDENCE: The site does not have a defined food fraud mitigation program for ingredients that would be defined having a higher risk.

ROOT CAUSE: The consideration for the mitigating steps against high-risk items has been included in the program. I was originally missing because Health-Ade does not have any high-risk items at this time.



QM 2.7.2 Food Fraud
10.4.2022.docx

CORRECTIVE ACTION: The Food Fraud program now defines steps to mitigate higher risk items.



QM 2.7.2 Food Fraud
10.4.2022.docx

VERIFICATION OF CLOSEOUT: The food fraud program has been updated and includes actions to be taken if a mitigation is required.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 10/05/2022

- 2.7.2.3** Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

- 2.7.2.4** The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

RESPONSE: COMPLIANT

2.8.1 Allergen Management (Mandatory)

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document FS 2.8 dated May 9, 2022 and is the responsibility of Quality Assurance Manager. The site has no allergens of concern in this operation. 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 lunchrooms, locker rooms and vending machines were found to be part of the allergen program. Instructions, defined in 2.8.1.5, have been provided to all relevant staff involved in handling allergenic product. The operation was found to have a product identification system that includes clear identification and labeling of products to meet regulatory requirements when made on production lines used for allergenic products. The site has a defined allergen program for incidental allergens that could be introduced by employees. The site conducted allergen awareness training on July 16 and 17, 2022 for all employees per the training registers from those dates. 2.8.1.2-2.8.1.10 N/A Site does not handle any allergens.

| | |
|---------|--|
| 2.8.1.1 | <p>The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan, and vi. Management plans for control of the identified allergens.</p> <p>RESPONSE: COMPLIANT</p> |
| 2.8.1.2 | <p>Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.3 | <p>Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.4 | <p>Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.5 | <p>Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.6 | <p>Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.7 | <p>The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.8 | <p>The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |
| 2.8.1.9 | <p>The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.</p> <p>RESPONSE: COMPLIANT</p> <p>EVIDENCE: N/A Site does not handle any allergens.</p> |

2.8.1.10 Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

RESPONSE: COMPLIANT

EVIDENCE: N/A Site does not handle any allergens.

2.8.1.11 Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

RESPONSE: COMPLIANT

2.9.1 Training Requirements

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of the management staff with updates reported in the training matrix. The effectiveness of the facility's training program was evidenced by interviews with plant employees Quality Technician, Maintenance Mechanic, and Filler Operator.

2.9.1.1 The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

RESPONSE: COMPLIANT

2.9.1.2 Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

RESPONSE: COMPLIANT

2.9.2 Training Program (Mandatory)

The site has implemented a training program, entitled QM 2.9.2 dated May 9, 2022, which covers the necessary competencies for plant personnel. This program requires training to be conducted in implementing HACCP, CCP Monitoring, Personal Hygiene, GMPs, Sampling and Test Methods, Environmental Monitoring, Allergen Management, and other tasks identified as critical to meeting the effective implementation of the SQF code. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering Food Defense, HACCP, GMPs and interviews with the first shift Quality technician and filler operator, it was evident the proper refresher training has been conducted to ensure food safety and the SQF system are maintained. Specific refresher training topics are covered on an annual basis. The training language and materials are in English and Spanish, the languages used in the operation and understood by all plant personnel. Training records reviewed included the participant name, skills description, description of training, date of training, trainer, and training verification. Minor 2.9.2.1 - The environmental swabbing training has not been documented.

- 2.9.2.1** A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

RESPONSE: MINOR

EVIDENCE: The environmental swabbing training has not been documented.

ROOT CAUSE: The annual refresher training schedule for the staff was not performed due to marking the item as completed on the training matrix. Upon further review of the training documents, that specific training was not performed. To prevent this from reoccurring, the training matrix will be monitored at least annually against the training records to verify that trainings were not marked as complete in error on the training matrix. The program document has been updated to include this verification.



QM 2.9 Training
9.16.2022.docx



DOC091622.pdf

CORRECTIVE ACTION: The environmental swabbing training was documented on 9/2/2022. Please see attached document.



DOC091622.pdf

VERIFICATION OF CLOSEOUT: The training document register was included in the corrective action showing that the Quality personnel responsible for the environmental swabbing was completed on September 2, 2022.

COMPLETION DATE: 09/02/2022 **CLOSEOUT DATE:** 10/05/2022

- 2.9.2.2** Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

RESPONSE: COMPLIANT

- 2.9.2.3** Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

11.1.1 Premises Location and Approval

An assessment, last reviewed on June 6, 2022, reviewed the environment surrounding the site. No issues that would affect the plant or products was noted on the report. The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. The site maintains the required approvals by relevant authorities, as evidenced by California State Department of Public Health (permit number 79586 with an expiration of November 11, 2022) and Los Angeles County Health (permit PR0189437 with an expiration of June 30, 2023) for their ongoing operations.

- 11.1.1.1** The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

11.1.2 Building Materials

Floors are constructed of concrete that has epoxy coatings in the fermentation room and batching rooms. The floor under the filler is also coated with epoxy. The floors are properly graded for effective drainage to trench drains in wet areas. Waste water trap systems meet the US Plumbing code and are located away from food handling areas. Wastewater during the audit was observed to be properly discharged. The trench drains were located and constructed for ease of cleaning and inspection. Walls and ceilings in the fermentation and blending rooms are constructed of white enamel painted insulated panels that were found to be in good repair. These areas were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. The site does not have any overhead drain lines. All waste piping is below the floors. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of white enamel coated insulated panels, which are easily cleaned and prevent product contamination. Minor 11.1.2.8 - The area above the batching and fermentation rooms does not have a pest monitoring program.

- 11.1.2.1** Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

RESPONSE: COMPLIANT

- 11.1.2.2** Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

RESPONSE: COMPLIANT

- 11.1.2.3** Waste trap system shall be located away from any food handling areas or entrances to the premises.

RESPONSE: COMPLIANT

- 11.1.2.4** Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

- 11.1.2.5** Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

- 11.1.2.6** Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

- 11.1.2.7** Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

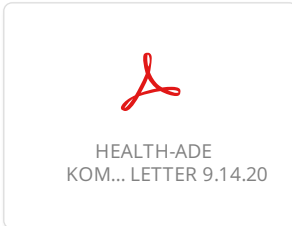
RESPONSE: COMPLIANT

- 11.1.2.8** Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

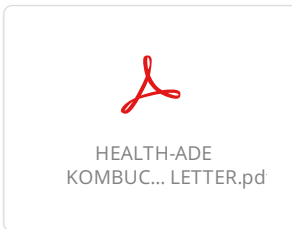
RESPONSE: MINOR

EVIDENCE: The area above the batching and fermentation rooms does not have a pest monitoring program.

ROOT CAUSE: The pest monitoring of this area of the building was not originally considered during the risk assessment for the design of our facility pest control program. We have now committed to inspect this area on a quarterly basis. Attached is the addendum to the program.



CORRECTIVE ACTION: Pest monitoring of this area of the building is now included in our pest control program. Attached is the update to our program.



VERIFICATION OF CLOSEOUT: The pest management program has been updated to include quarterly inspections of the areas above the blending and kombucha rooms.

COMPLETION DATE: 09/14/2022 **CLOSEOUT DATE:** 09/30/2022

- 11.1.2.9** Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

RESPONSE: NOT APPLICABLE

11.1.3 Lightings and Light Fittings

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is LED by nature either covered or is shatter-proof.

- 11.1.3.1** Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

RESPONSE: COMPLIANT

- 11.1.3.2** Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

- 11.1.3.3** Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

RESPONSE: COMPLIANT

11.1.4 Inspection/ Quality Control Area

Suitable space is provided for inspection and quality control activities, that are suitable for the examination and testing of the product. The area has easy access to hand washing; appropriate waste handling; and is kept clean.

- 11.1.4.1** If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

11.1.5 Dust, Insect, and Pest Proofing

External windows, doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were sealed to prevent infestation. Electric insect devices, and interior and exterior rodent stations are located so the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

- 11.1.5.1** All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

RESPONSE: COMPLIANT

- 11.1.5.2** External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

RESPONSE: COMPLIANT

- 11.1.5.3** Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

RESPONSE: COMPLIANT

11.1.6 Ventilation

Adequate ventilation was available, where needed, in enclosed processing and food handling areas. Ventilation equipment was seen to be adequately cleaned, insect-proofed, and located to not pose a risk of contamination. Ventilation and heat extraction were observed to be adequate around the HTST processor. NA 11.1.6.3 - The site does not have extraction fans or canopies.

- 11.1.6.1** Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

RESPONSE: COMPLIANT

- 11.1.6.2** All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

RESPONSE: COMPLIANT

- 11.1.6.3** Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not have extraction fans or canopies.

- 11.1.6.4** Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

RESPONSE: COMPLIANT

11.1.7 Equipment and Utensils

Specifications for the equipment and operational areas were reviewed and found to be complete. Purchasing procedures for equipment are documented in QM 11.2.2 dated June 15, 2022 and were seen to be appropriately implemented. Equipment and utensils are constructed of stainless steel or food grade plastics and are designed, constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. These items were found to be cleaned and stored properly after use to prevent cross contamination. The site does not have an equipment storage room or area. Equipment surfaces were of stainless steel construction. Containers and bins are made of non-toxic materials and were labeled or color-coded, for appropriate use with either edible or non-edible materials. Forklifts and other vehicles in processing areas and storage areas were observed to not present a food hazard. Non-conforming equipment is identified, tagged, and/or segregated by means of colored hold tags. Records of non-conforming equipment are maintained in the hold log QMR 11.

- 11.1.7.1** Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

- 11.1.7.5** Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

RESPONSE: COMPLIANT

- 11.1.7.6** Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

- 11.1.7.7** All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

- 11.1.7.8** Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

- 11.1.7.9** Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

RESPONSE: COMPLIANT

11.1.8 Grounds and Roadways

Exterior inspections are required to be completed on a monthly basis. Exterior inspection records were reviewed from August 5, 2022 . The grounds and surrounding areas were observed to minimize dust and be free of any waste so pests are not attracted. Paths, roadways and dock areas were seen to be adequately and properly drained and well maintained, so they do not present a hazard. No pooling water was observed during exterior inspections. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

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| 11.1.8.1 | <p>A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.1.8.2 | <p>Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.1.8.3 | <p>Paths from amenities leading to site entrances shall be effectively sealed.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1 | <p>Repairs and Maintenance</p> <p>The site has a program, QM 11.2.9 dated June 17, 2021, that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. There is a schedule of planned Preventive Maintenance, and tasks are documented in the teams. The site uses an excel spreadsheet to record the maintenance actions for by month in the columns next to the maintenance action. The site has defined maintenance work orders for preventive maintenance and records are stored by piece of equipment in individual binders. The work orders are reviewed when completed and the maintenance schedule is updated with the actions. Temporary repairs are documented on Maintenance Form 001 included in the cleaning program and have a plan for their removal. Machinery, conveyors and other equipment over or near food or food contact surfaces are lubricated with food grade materials. The food grade lubricants were noted to be properly labeled and stored separately from non food grade lubricants in a marked storage cabinet for maintenance materials. Paint is not used on food contact surfaces and paint is not allowed on processing equipment.</p> |
| 11.2.1.1 | <p>The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.2 | <p>Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.3 | <p>Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.4 | <p>Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.5 | <p>The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.6 | <p>Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.7 | <p>Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.1.8 | <p>Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.</p> <p>RESPONSE: COMPLIANT</p> |

11.2.2 Maintenance Staff and Contractors

Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures following the visitor program. When repairs and maintenance are complete, maintenance personnel remove all tools and debris and notify a supervisor. Appropriate cleaning and pre-operational inspections are carried out before resumption of operations, documented on the maintenance work orders. Maintenance personnel are trained in good manufacturing practices and food safety. This was reviewed during the audit and found to be complete.

11.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

RESPONSE: COMPLIANT

11.2.2.2 All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

RESPONSE: COMPLIANT

11.2.2.3 Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

RESPONSE: COMPLIANT

11.2.3 Calibration

A policy, QM 11.2.10 dated May 9, 2022 defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented. Equipment is calibrated against national or international standards. A procedure to address the disposition of any affected product should inspection equipment be found to be out of calibration, is defined on page 2 of the QM 11.2.10 document. Inspection and testing equipment is protected from damage or unauthorized use by location and in some cases by shrouding. The facility has developed a calibration schedule for all devices listed. This documentation is QMR 190-BP dated July 18, 2022 that is used for the documentation of the quality instruments. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. A review of the calibration records for Ohaus CS5000 scale May 2, 2022 by US Calibrations and a weight set that has weights from 5 kg serial number 9913 that was conducted on May 3, 2022 by US Calibration confirms the schedule is being followed. The maintenance calibrations are recorded on QMR 190. Minor 11.2.3.6 - The calibration program for maintenance does not include the calibrations for the flow meters, conductivity meters, and pressure gauges.

11.2.3.1 The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

11.2.3.2 Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

11.2.3.3 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: COMPLIANT

11.2.3.4 Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

RESPONSE: COMPLIANT

11.2.3.5 Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

RESPONSE: COMPLIANT

11.2.3.6 A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

RESPONSE: MINOR

EVIDENCE: The calibration program for maintenance does not include the calibrations for the flow meters, conductivity meters, and pressure gauges.

ROOT CAUSE: The master calibration register did not include all of the required assess on the list. The resister has been review and updated to include the onsite temperature probes and flow meters. Attached is the updated register.



QMR 190-BP and
Torrance M... 9.16.20

CORRECTIVE ACTION: The calibration program has been updated to include the facility flow meters and conductivity meters. Attached is the updated register.



QMR 190-BP and
Torrance M... 9.16.20

VERIFICATION OF CLOSEOUT: The site has updated the calibration program and now includes the flow meters, conductivity probes, pressure gauges that are used to control the pastuerizer.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

11.2.4 Pest Prevention

A pest prevention program that defines the methods, responsibilities, and maintenance has been documented, QM 11.2.11 dated May 16, 2022, and was observed to be effectively implemented. No pest activity was identified or noted during tours that presented a risk for product contamination and corrective action. Record keeping procedures are in place should this occur. The methods used to make staff aware of the bait control program and measures to take when they come into contact with a bait station is defined on page 5 of QM 12.11 and in pest control training. The trending of the pest activity frequency is documented on the contract service providers site for any time frame. A Pest Contractor has been contracted for pest prevention and an updated scope of service, dated July 14, 2022, defines the methods of pest prevention, the frequency of interior and exterior inspections (weekly), and targeted pests. A current site map, dated July 14, 2022, is accurate showing the location of 29 external, 86 internal devices, and 23 ILTs. A list of chemicals used by the Pest Contractor is found on the service contractors portal and includes SDS information. A pesticide application log gives details and dates of all chemical usage. Licenses of the Pest Contractor, expiring on June 30, 2023 from local authorities are current and indicate employees are trained and competent. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues noted by the Pest Contractor are addressed and documented by the site. No animals are allowed on-site in food handling or storage areas.

11.2.4.1 A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

RESPONSE: COMPLIANT

- 11.2.4.2** Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

- 11.2.4.3** Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

- 11.2.4.4** Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

- 11.2.4.5** Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.5 Cleaning and Sanitation

The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods, frequency of cleaning, and who is responsible. Chemicals, were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Dispensed cleaning chemicals were properly stored and identified. Cleaning chemicals mixed on-site have concentration checks conducted by the sanitation lead and recorded in the CIP Log. Procedures for CIP systems defining the parameters required are found in document San 005 dated June 3, 2022, are monitored and the results recorded the on CIP Log , dated August 1- 5, 2022. CIP equipment viewed during the audit appeared to be appropriately maintained. Requirements were seen to be in place for the validation of any changes made to CIP equipment, and personnel engaged in CIP activities were required to be appropriately trained. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a food product contamination. Sanitation tasks and pre-operational inspections by qualified personnel are documented. Pre-operational inspections for dates August 10, 2022 to August 23, 2022 were reviewed and had proper corrective actions documented as required. A verification schedule, documented in the CIP Log, includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. A master sanitation plan (defined in SAN -002 and dated June 3, 2022) includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan dated June 1, 2022 through August 15, 2022 showed cleaning tasks were completed as scheduled. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted August 22, 2022.

- 11.2.5.1** The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

- 11.2.5.2** Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

- 11.2.5.3** Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

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| 11.2.5.4 | <p>Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.5.5 | <p>Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.5.6 | <p>Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.5.7 | <p>Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.5.8 | <p>Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.2.5.9 | <p>The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.3.1 | <p>Personnel Welfare</p> <p>Employees are prohibited from working in food handling or open food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented in policy QM 11.3.1 dated June 26, 2022 measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy in document QM 11.3.1 includes the prohibition of any food handling activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. A medical screening procedure dated June 26, 2022 is in place for all employees, visitors and contractors who enter the facility.</p> |
| 11.3.1.1 | <p>Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.3.1.2 | <p>The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.3.1.3 | <p>Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.</p> <p>RESPONSE: COMPLIANT</p> |
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11.3.2 Handwashing

Handwashing was observed to be required upon entering food handling or processing areas, after toilet visits, after using a handkerchief, after smoking, eating, drinking, and after handling wash down hoses, cleaning materials, or contamination materials per document QA 11.3.1. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands-free operated taps and hand sanitizers are used in the facility. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews were conducted with the Quality Technician, Filler Operator, and Receiver. During the audit, it was demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and to use proper glove procedures.

- 11.3.2.1** All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

- 11.3.2.2** Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

- 11.3.2.3** Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

- 11.3.2.4** The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.

RESPONSE: COMPLIANT

- 11.3.2.5** Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

RESPONSE: COMPLIANT

- 11.3.2.6** When gloves are used, personnel shall maintain the handwashing practices outlined above.

RESPONSE: COMPLIANT

11.3.3 Clothing and Personal Effects

A policy, based on a documented risk assessment, found in QM 11.3 dated May 9, 2022, defines the site's clothing requirements and been implemented. Clothing including shoes are required to be clean at the commencement of the shift and changed or replaced if excessively soiled. Disposable gloves and aprons changed when soiled or damaged. Employees were observed to comply with the clothing requirements of the facility. Protective clothing was observed to be manufactured from materials that will not pose a risk to food safety. A policy defining jewelry use has been written in QM 11.3.1 and implemented. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy per page 2 of QM 11.3.1. Prescribed Medical Alert bracelets or jewelry accepted for religious or cultural reasons are allowed by risk assessment and must be covered and not pose a food safety risk.

- 11.3.3.1** The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

RESPONSE: COMPLIANT

- 11.3.3.2** Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products.

RESPONSE: COMPLIANT

- 11.3.3.3** Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

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| 11.3.3.4 | Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk. RESPONSE: COMPLIANT |
| 11.3.3.5 | Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment. RESPONSE: COMPLIANT |
| 11.3.3.6 | Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. RESPONSE: COMPLIANT |
| 11.3.3.7 | Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities. RESPONSE: COMPLIANT |
| 11.3.3.8 | Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management. RESPONSE: COMPLIANT |
| 11.3.4 | Visitors A policy defining visitor and contractor requirements, found in QM 11.3 dated February 25, 2022 is documented and implemented. The policy requires that visitors be trained in hygiene and food safety requirements before entering food processing or handling areas, or that they be continually escorted while in those locations. The requirements for visitors in those areas include the proper use of access points, hand wash requirements, suitable protective clothing and footwear, removal of jewelry or other loose objects, and an absence of visible signs of illness. The site has a monitoring program that all visitors are required to complete prior to entry of the facility. |
| 11.3.4.1 | All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing and handling areas or shall be escorted at all times in food processing, handling, and storage areas. RESPONSE: COMPLIANT |
| 11.3.4.2 | All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area. RESPONSE: COMPLIANT |
| 11.3.4.3 | Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed. RESPONSE: COMPLIANT |
| 11.3.4.4 | Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements. RESPONSE: COMPLIANT |
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11.3.5 Staff Amenities (change rooms, toilet, break rooms)

Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. Documented cleaning procedures of staff amenities are documented in SOP 605 dated June 15, 2022. There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas. Change rooms are provided for employees. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. An area has been provided for the storage of outer garments and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with the Engineering Manager combined with onsite observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Lunchrooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunchrooms include hot and cold potable water, food storage areas, refrigerators, and hand and utensil washing capabilities. Outside eating areas are properly maintained to prevent contamination and pest risks. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunchrooms and in or adjacent to outside eating areas where applicable. Lunchrooms were observed to be clean and well-maintained during the audit tours. NA 11.3.5.3 - The site does not have high risk products or processes. NA 11.3.5.5 - The site does not have showers.

11.3.5.1 Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

11.3.5.2 Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

RESPONSE: COMPLIANT

11.3.5.3 High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not have high risk products or processes.

11.3.5.4 Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

RESPONSE: COMPLIANT

11.3.5.5 Where required, a sufficient number of showers shall be provided for use by staff.

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not have showers.

11.3.5.6 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

RESPONSE: COMPLIANT

11.3.5.7 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

RESPONSE: COMPLIANT

11.3.5.8 Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

RESPONSE: COMPLIANT

11.3.5.9 Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

- 11.3.5.10** Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site.

RESPONSE: COMPLIANT

11.4.1 Staff Engaged in Food Handling and Processing Operations

Food handling procedures for all employees are documented (QM 11.3) and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited and no violations were noted. Hair restraints were observed to be worn where the product is exposed. Ingredients were in appropriate, labeled containers and kept off the floor. The GMP policy prohibits smoking, eating, drinking (accept for water) or spitting in the facility. Smoking is permitted only in designated areas. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. The process flow was observed to be logical, with a continuous flow and designed to prevent cross contamination. It was observed during audit tours that the flow of employees is such that any cross contamination is minimal. Wash down hoses were observed to be properly stored on racks when not in use.

- 11.4.1.1** All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

- 11.4.1.2** Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

RESPONSE: COMPLIANT

- 11.4.1.3** The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

- 11.4.1.4** In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment.

RESPONSE: COMPLIANT

11.5.1 Water Supply

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from the Torrance Municipal Water system. It was determined that there was adequate hot and cold water for cleaning and processing. Back flow devices are installed on water lines. Back flow devices are tested annually, and the last test was conducted on October 1, 2021 by A-A Back flow Testing and Maintenance. The site has 10 back flow preventers that require testing. The site has one 10,000 gallon water storage tank that has UV water sterilization. NA 11.5.1.5 -The site would shut down in the event of a municipal water quality issue. NA 11.5.1.5 - The site does not have a source of non potable water.

- 11.5.1.1** Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

RESPONSE: COMPLIANT

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| 11.5.1.2 | <p>Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site would shut down in the event of a municipal water quality issue.</p> |
| 11.5.1.3 | <p>Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.1.4 | <p>The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.1.5 | <p>The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have a source of non potable water.</p> |
| 11.5.1.6 | <p>Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.2 | <p>Water Treatment</p> <p>Water is treated effectively at this site by means of carbon filtration, RO water membrane filtration, and UV treatment. The water treatment equipment is serviced by Evoqua that are contracted to a monthly service of the RO equipment. The treated water is monitored on a schedule by plant operators. Water used as an ingredient or in cleaning or sanitizing equipment has been tested to ensure that water potability is maintained. Section 11.5.4 covers the site's potability testing. The site shows monthly testing of the RO water for chemical analysis of the RO water.</p> |
| 11.5.2.1 | <p>Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.2.2 | <p>Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.2.3 | <p>Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.5.3 | <p>Water Quality</p> <p>Water used as an ingredient, processing, cleaning, and handwashing is monitored periodically for potability by the site. The manufacture with the potable water complies with potable water microbiological and quality standards. Samples from inside the facility are sent to an outside lab for analysis. Based on risk, the site's testing frequency is set at an annual minimum frequency. The last potability test was conducted on March 17, 2022 through Food Microbiological Laboratories</p> |
| 11.5.3.1 | <p>Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.</p> <p>RESPONSE: COMPLIANT</p> |

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| 11.5.3.2 | Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually. RESPONSE: COMPLIANT |
| 11.5.3.3 | Water and ice shall be analyzed using reference standards and methods. RESPONSE: COMPLIANT |
| 11.5.4 | Ice Supply NA 11.5.4.1 - 3 - The site does not use or generate ice. |
| 11.5.4.1 | Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1. RESPONSE: NOT APPLICABLE EVIDENCE: The site does not use or generate ice. |
| 11.5.4.2 | Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate. RESPONSE: NOT APPLICABLE EVIDENCE: The site does not use or generate ice. |
| 11.5.4.3 | Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution. RESPONSE: NOT APPLICABLE EVIDENCE: The site does not use or generate ice. |
| 11.5.5 | Air and Other Gasses Carbon Dioxide is used as beverage carbonation for the finished product. Compressed air is only used to operate equipment and does not come in contact with food or food contact surfaces. The carbon dioxide used for the carbonation of the finished product has a minimum purity rating of 99.8% which is tested on every load of gas that is delivered. Compressed air or carbon gas systems are regularly maintained and monitored per the preventive maintenance. Kaesar performs the maintenance of the air compressors. |
| 11.5.5.1 | Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety. RESPONSE: COMPLIANT |
| 11.5.5.2 | Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually. RESPONSE: COMPLIANT |
| 11.6.1 | Receipt, Storage and Handling of Goods The site has implemented effective documented storage plan(s) for the storage of raw materials, ingredients, packaging, equipment and chemicals. The document QM 11.6 dated May 9, 2022 was reviewed during the audit and found to be acceptable. Stock rotation, based on FIFO (per page 4) has been implemented by the site to ensure that all materials are used within their designated shelf-life. This stock rotation program is documented in the program "Just Foods" and uses a FIFO program. The warehouse manager is responsible for the program management. NA 11.6.1.5 - 6- The site does not have overflow or temporary storage locations for materials or product. |
| 11.6.1.1 | The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals. RESPONSE: COMPLIANT |
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| 11.6.1.2 | <p>Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.6.1.3 | <p>The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.6.1.4 | <p>Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.6.1.5 | <p>Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have overflow or temporary storage locations for materials or product.</p> |
| 11.6.1.6 | <p>Records shall be available to verify the effectiveness of alternate or temporary control measures for the storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have overflow or temporary storage locations for materials or product.</p> |
| 11.6.2 | <p>Cold Storage, Freezing and Chilling of Foods</p> <p>Cold storage trailers are used to store finished product under refrigeration until the point of shipment. Temperature monitoring methods are defined in QM 11.6. on page 2. The temperatures of the trailers are recorded on the Shift QA on line check once per shift. NA 11.6.2.1 -2 - The site does not have refrigerated storage areas in the facility and utilizes refrigerated trailers for all refrigerated storage. Minor 11.6.2.3 - The program does not define who and when the refrigerated trailer temperatures are to be recorded. Temperatures are monitored once per shift by Quality Assurance but the procedure only states that warehouse personnel perform a temperature check. NA 11.6.2.4 - All refrigerated storage is on trailers. The site has no dedicated refrigerated storage areas.</p> |
| 11.6.2.1 | <p>The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and be easily accessible for inspection and cleaning.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have refrigerated storage areas in the facility and utilizes refrigerated trailers for all refrigerated storage.</p> |
| 11.6.2.2 | <p>Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have refrigerated storage areas in the facility and utilizes refrigerated trailers for all refrigerated storage.</p> |
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- 11.6.2.3** The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: MINOR

EVIDENCE: The program does not define who and when the refrigerated trailer temperatures are to be recorded. Temperatures are monitored once per shift by Quality Assurance but the procedure only states that warehouse personnel perform a temperature check.

ROOT CAUSE: The program did not accurately reflect the identified staff members that the perform the temperature monitoring task. This oversight was not identified during the annual program reviewed. The program has been updated with the correct information.



QM 11.6 Loading
Tra... Practices.docx

CORRECTIVE ACTION: The program was updated to accurately reflect the appropriate persons who perform the temperature monitoring of the trailers.



QM 11.6 Loading
Tra... Practices.docx

VERIFICATION OF CLOSEOUT: The site has updated the temperature monitoring program and now includes the temperatures and the teams responsible for the monitoring of temperatures and when.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

- 11.6.2.4** Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

RESPONSE: NOT APPLICABLE

EVIDENCE: All refrigerated storage is on trailers. The site has no dedicated refrigerated storage areas.

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

Storage areas for raw materials, packaging and finished goods were observed to be located away from any wet areas, clean and well maintained. The product is protected from contamination, deterioration and pest harborage. The site does not have ingredient racking and only floor stacks ingredients prior to use. NA 11.6.3.2 - The site does not have ingredient or finished product racking systems.

- 11.6.3.1** Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

- 11.6.3.2** Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not have ingredient or finished product racking systems.

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. A current register of chemicals in the facility, QM 11.6 dated May 9, 2022. Chemical storage areas were observed to be locked, adequately ventilated, and have appropriate signage. Pesticides are not stored on site and are maintained with the pest control service provider. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals dated August 2, 2022 and had first aid and spill containment equipment available. Cleaning chemicals are pulled as needed for cleaning solutions. All stored chemicals have current SDS information on file at the facility and available both in paper files and electronic documents. Training for employees, Sanitation Technicians, who handle hazardous chemicals and toxic substances were observed to have training records available. SDS and the label declaration and/or documented approval for the chemical's intended use were reviewed for HTST Acid, CIP NC, and CCI PAA 5 from CCI chemicals.

- 11.6.4.1** Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

- 11.6.4.3** Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in-progress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

RESPONSE: COMPLIANT

- 11.6.4.4** Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel.

RESPONSE: COMPLIANT

- 11.6.4.5** Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals; i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

RESPONSE: COMPLIANT

- 11.6.4.6** The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

RESPONSE: COMPLIANT

- 11.6.4.7** In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment.

RESPONSE: COMPLIANT

11.6.5 Loading, Transport, and Unloading Practices

A policy defining the practices for loading, unloading and storage of food products has been documented and implemented in document QM 11.6. It was observed during the audit tours that food is unloaded, stored and loaded under conditions that prevent cross contamination. The site's policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading and that vehicles be secured from tampering by use of seal or other agreed method. Trailer inspection records were reviewed for July 25, 2022 and June 23, 2022. Trailers and vehicles used for transport were observed to be properly secured from tampering by a the use of seals. The seal numbers are recorded on the load maps. Refrigerated trailer set temperatures are checked at the beginning of the loading and checked at the end of loading with a IR temperature gun. This was observed to be recorded for product shipped on June 23, 2022 and July 26, 2022. It is the responsibility of the carrier to maintain the required temperatures during transport to the final destination. Refrigeration unit temperatures are monitored and recorded before opening the trailer doors. Product temperatures are recorded at appropriate intervals during the unloading. Temperatures were reviewed for July 27, 2022 and found to be properly recorded. Warehouse interviews with the warehouse supervisor revealed that employees are aware of the proper procedures and follow them. It was observed that unloading practices are designed to prevent product contamination. Minor 11.6.5.5 - The program does not define the required temperatures for the refrigerated products in the procedure but the temperatures are recorded on the load map and meet refrigerated temperature ranges.

11.6.5.1 The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

RESPONSE: COMPLIANT

11.6.5.2 Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

11.6.5.3 Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

RESPONSE: COMPLIANT

11.6.5.4 Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

RESPONSE: COMPLIANT

- 11.6.5.5** Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

RESPONSE: MINOR

EVIDENCE: The program does not define the required temperatures for the refrigerated products in the procedure but the temperatures are recorded on the load map and meet refrigerated temperature ranges.

ROOT CAUSE: The program did not accurately identify the required temperatures for the refrigerated products in the procedure. This oversight was not identified during the annual program reviewed. The program has been updated with the correct information.



QM 11.6 Loading
Tra... Practices.docx

CORRECTIVE ACTION: The program was updated to accurately define the required temperatures for the refrigerated products.



QM 11.6 Loading
Tra... Practices.docx

VERIFICATION OF CLOSEOUT: The temperatures specifications are defined for the frozen and refrigerated products in the procedure update. The temperatures align with industry standards for the refrigerated and frozen materials and products.

COMPLETION DATE: 09/16/2022 **CLOSEOUT DATE:** 09/30/2022

- 11.6.5.6** The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit.

RESPONSE: COMPLIANT

- 11.6.5.7** On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

RESPONSE: COMPLIANT

- 11.6.5.8** Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

RESPONSE: COMPLIANT

11.7.1 High-Risk Processes

NA 11.7.1.1 - 5 - The site does not have high processes or products.

- 11.7.1.1** The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized.

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not have high processes or products.

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| 11.7.1.2 | <p>Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have high processes or products.</p> |
| 11.7.1.3 | <p>Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have high processes or products.</p> |
| 11.7.1.4 | <p>Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have high processes or products.</p> |
| 11.7.1.5 | <p>Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have high processes or products.</p> |

11.7.2 Thawing of Food

NA 11.7.2.1 - 3 - The site does thaw frozen ingredients and only chips the ingredient the day of use.

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| 11.7.2.1 | <p>Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does thaw frozen ingredients and only chips the ingredient the day of use.</p> |
| 11.7.2.2 | <p>Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does thaw frozen ingredients and only chips the ingredient the day of use.</p> |
| 11.7.2.3 | <p>Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does thaw frozen ingredients and only chips the ingredient the day of use.</p> |

11.7.3 Control of Foreign Matter Contamination

Policy QM 11.3.B defines the methods and responsibilities to prevent foreign material contamination. The policy's implementation was demonstrated by pre-operational inspections and regularly scheduled maintenance inspections, that are conducted and documented for the condition of equipment and any potential contaminants. A glass register has been documented with glass, brittle plastic and ceramic sources included in all areas of the plant. The site has a glass policy defined in document QM 11.7.5 dated May 9, 2022. The glass register is current as of August 15, 2022 and documented on QMR 030. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted on August 15, 2022 was reviewed and found to be completed as scheduled. The site's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection (including of cleaning equipment and footwear) is conducted if glass breakage occurs. A responsible person, Quality Assurance Supervisor, is required to inspect the affected area before the restarting of production. Wood pallets were clean and in good condition, and the facility has a policy prohibiting and/or controlling wooden utensils in processing/food handling areas. The site has a documented knife policy, and knives are controlled, cleaned and required to be in good condition. Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate are inspected through the preventive maintenance program and is specific to the piece of equipment and documented on the preventive maintenance work order for that equipment.

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| 11.7.3.1 | <p>The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.2 | <p>Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.3 | <p>Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.4 | <p>Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.5 | <p>In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, thoroughly inspected (including cleaning equipment and footwear), and cleared by a suitably responsible person prior to the start of operations.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.6 | <p>Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.7 | <p>Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.8 | <p>Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.3.9 | <p>Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.4 | <p>Detection of Foreign Objects</p> <p>QM 11.7.3B dated May 9, 2022, defines the methods and responsibilities for the use of foreign material detection, has been documented and implemented. The site has in line screens that are 150 mesh or .8 microns in diameter that is defined as CCP2. The in-line screens are checked after each batch of concentrate by the operations and Quality Assurance Technician. Demonstration and documentation of the devices were observed during the audit tours. Interviews with employees and the Quality Technician responsible for the monitoring, indicated they were knowledgeable and understood what to do if the devices failed when tested with known samples. Records reviewed demonstrated the site was verifying the functioning of these devices, documenting any objects rejected or removed by them and implementing corrective actions.</p> |
| 11.7.4.1 | <p>The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.4.2 | <p>Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.</p> <p>RESPONSE: COMPLIANT</p> |

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| 11.7.4.3 | <p>Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.4.4 | <p>Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.7.4.5 | <p>In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1 | <p>Waste Disposal</p> <p>A policy defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented, and is found in document 11.8.1.10. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas on the interior and exterior of the facility were observed to be well-maintained and clean. Solid waste from processing was observed to be properly disposed of. Wastewater is discharged to plant drains and collected for disposal to the municipality's wastewater system. NA 11.8.1.6 - The site does not have trademarked material NA 11.8.1.7 - The site does not generate inedible waste for animal feed.</p> |
| 11.8.1.1 | <p>The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1.2 | <p>Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1.3 | <p>Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1.4 | <p>Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1.5 | <p>Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.</p> <p>RESPONSE: COMPLIANT</p> |
| 11.8.1.6 | <p>Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not have trademarked materials.</p> |
| 11.8.1.7 | <p>Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: The site does not generate inedible waste for animal feed.</p> |
| 11.8.1.8 | <p>Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.</p> <p>RESPONSE: COMPLIANT</p> |

11.8.1.9 Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

RESPONSE: COMPLIANT

11.8.1.10 Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

RESPONSE: COMPLIANT