



SQF Food Safety Audit Edition 9

The DeLong Company, Inc. Joliet South

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
13678 | 880570

AUDIT RATING

DECISION DATE
11/21/23

AUDIT TYPE
RE-CERTIFICATION



RE-CERTIFICATION DATE
11/15/24

AUDIT DATES
10/31/23 - 11/01/23

Excellent

EXPIRATION DATE
01/29/25

ISSUE DATE
11/21/23

Facility & Scope

The DeLong Company, Inc. Joliet South
2131 Logistics Ct.
Joliet, IL 60436
United States

Food Sector Categories:
22. Processing of Cereal Grains

Products:
soybeans, corn

Scope of Certification:
Processing of soybeans and corn

Certification Body & Audit Team

EAGLE Food Registrations, Inc.
40 N. Main Street Suite 1880 Dayton, OH, 45423,
United States

CB#: CB-1-Eagle
Accreditation Body: ANSI
Accreditation Number: 894

Lead Auditor: Jim Marasco (10428)
Technical Reviewer: Christina Ramsey (427351)
Other Members:
N/A

Hours Spent on Site: 16
Hours of ICT Activities: 0
Hours Spent Writing Report: 8

Non-Conforming

11.1.5 Dust, Insect, and Pest Proofing

External windows, doors and other openings were generally in good condition and 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.

Minor nonconformance 11.1.5.2 during the audit of the new warehouse the auditor note the three dockdoors had gaps between the floor and the leveler plates about 1 inch. A potential risk for pest ingress.

- 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: MINOR

EVIDENCE: Minor - during the audit of the new warehouse the auditor note the three dockdoors had gaps between the floor and the leveler plates about 1 inch. A potential risk for pest ingress.

ROOT CAUSE: The new warehouse addition was just finished in July of 2023. The dock levelers were not outfitted with proper weather/pest seal kits. They were cheap, not installed properly or damaged. Contractors and DeLong failed to verify light was not seen or spaces were not open to the outside.

CORRECTIVE ACTION: Checks to be added on the FM-015 weekly walk around. See attached updated form. Cleaning plant manager will check daily to make sure dock doors don't become a risk of pest ingress. Item to be checked on-going with weekly walk around form and again in May 2024 to ensure that audit point remains closed.

VERIFICATION OF CLOSEOUT: Containment, root cause analysis, and corrective action plan acceptable

COMPLETION DATE: 11/13/2023 **CLOSEOUT DATE:** 11/15/2023

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner RESPONSE: RYAN BROOKS

SQF Practitioner Email	Email of the designated SQF Practitioner
	RESPONSE: RBROOKS@DELONGCOMPANY.COM
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)
	RESPONSE: RYAN BROOKS: SAFETY DIRECTOR / SQF PRACTITIONER, JAMES MARASCO: LEAD 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 PRODUCTS HANDLED AT THIS FACILITY ARE GMO AND NON-GMO SOYBEANS AND LIMITED QUANTITIES OF RAW AGRICULTURAL COMMODITIES (SUCH AS CORN). THE SITE EMPLOYS 25 INDIVIDUALS WORKING 2 SHIFTS 6 AM TO 4 PM AND 10 PM TO 6 AM (MONITORING THE CLEANERS). THE PRODUCT CAN BE PACKED INTO SHIPPING CONTAINERS, LOADED INTO 2,200 LBS. TOTES, OR PLACED INTO 60 LB. PAPER BAGS. THE TOTAL SQUARE FEET OF THE FACILITY (PRODUCTION AND WAREHOUSE) IS 48,140 SQF. 19- GRAIN BINS OF VARIOUS SIZES ARE MADE OF GALVANIZED STEEL ALONG WITH METAL TIN-REINFORCED ROOFS. GRAIN BINS ARE DEDICATED PER PURPOSE (INBOUND, FINISHED, SPECIALIZED, ETC.). THERE ARE 2 OFFICES: THE MAIN OFFICE WHICH IS 1,800 SQFT. AND THE LOADOUT OFFICE WHICH IS 1,250 SQFT. THE DUMP PIT BUILDING IS 5,040 SQFT. THERE ARE 2 PRODUCTION AREAS: THE CLEANING BUILDING/WAREHOUSE WHICH IS 33,800 SQF. AND THE LOADOUT BUILDING WHICH IS 6,250 SQF. THE MAINTENANCE SHOP IS 3,600 SQFT. THE PRODUCT WAS INSPECTED BY USDA PRIOR TO RECEIVING AND SHIPPING.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)
	RESPONSE: RYAN BROOKS: SAFETY DIRECTOR / SQF PRACTITIONER, JAMES MARASCO: LEAD AUDITOR
Auditor Recommendation	Auditor Recommendation
	RESPONSE: RECERTIFICATION PENDING CORRECTIVE ACTION COMPLETION

2.1.1 Management Responsibility (Mandatory)

The site has a food safety commitment policy called POL-002.1 Food Safety Policy Statement rev 11/13/2020, that senior management has implemented. It was signed by a senior manager, Superintendent and on 01/11/2023. The Policy Statement covers customer and regulatory requirements, food safety culture identifying clear and concise food safety objectives and performance measures and methods of communication to all the staff and the review of food safety objectives. The Policy is communicated to the facility's staff by way of annual training and is in languages used on the site. The policy was observed to be posted in the break room and at the entrance to the office. Safety Manager is the designated SQF Practitioner, is a full-time employee of the facility and has a HACCP food safety training course, as evidenced by (HACCP, SQF, and is PCQI trained (SQFP, Implementing SQF 08/17/2015, HACCP IHA approved 06/28/-6/30/2016, FSPCA PCQI, 06/29-6/30/2016, Food Defense 06/14/2019, SQFP B/U IHA Basic HACCP 01/18/19-01/19/2019, Food Safety for Carriers Awareness Module rev 09/15/2021) The SQF Practitioner is responsible for the development, implementation and maintenance of the SQF System. An alternate SQF Practitioner has been identified who is competent to maintain the SQF system in the absence of a designated SQF Practitioner. A food safety culture plan was in place and documented in POL-003.8 Food Safety Culture Survey. The results from the survey on 02/08/2023 indicated an understanding of food safety. The site uses the Top 10 tenants for Safety and Food Safety to drive cultural performance. Tenants discuss the need for investment and accountability to drive food safety. In addition, employees interviewed understood their role in maintaining food safety and handling non-conforming products. Job descriptions (Supervisor, President, Facility Mgr., SQFP job descriptions reviewed rev 10/15/2015) exist for key management roles and those impacting food safety; the SQF practitioner and backup were identified via POL-003.1. The organizational Chart was reviewed and is current (09/09/2022). Plant staff is required to report food safety issues to management, as evidenced by the policy in the Nonconforming Product and Equipment policy POL-015 and interviews with warehouse and cleaning operations areas. 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.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE: Announced audit.

2.1.2 Management Review (Mandatory)

The entire SQF System is reviewed monthly (POL-004 Management Review) by the site's senior management with the last review documented and completed on 10/12/2023. The review includes the food safety culture, food safety manual, internal and external audit findings, the investigations and resolutions of corrective actions, and customer complaints with investigations and resolution. Food safety plans, Good Manufacturing Practices, and the rest of the SQF system are reviewed by management when any potential changes are made in products and processes. The SQF Practitioner has updated senior site management on a monthly basis, by means of Management review meetings, on any matters that impact the site's SQF System.

- 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

EVIDENCE:

- 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

EVIDENCE:

2.1.3 Complaint Management (Mandatory)

The site has POL-005 Complaint Management rev 11/13/2020 which defines complaint management procedures. The site has a consumer complaint log in Excel that lists the complaints by a tab. Corporate answers initial emails regarding complaints. Complaints are tracked by booking number and they are categorized into Foreign Material, Heat Damage, Container Issue, Mold, and Misc. There has been one reported complaint YTD 2023. The customer complaint dated 02/28/2023, 05/22/2023 and 06/19/2023 were reviewed. Corrective and preventative action was implemented, and the root cause analysis was outlined in 2.5.3.

- 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

EVIDENCE:

- 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

EVIDENCE:

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

EVIDENCE:

2.2.1 Food Safety Management System (Mandatory)

A food safety manual has been developed and is maintained in hard copy and/or electronic form called POL-001 Food Safety and Quality Plan 02/07/2023 rev 5. It was maintained by SQFP. The food safety manual contains the food safety policy, organization chart, scope of the certification, a list of products in the scope, the organizational chart, process controls, programs, and procedures that make up the site's SQF System. It is made available to all relevant staff by means of a local server and MaintX.

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

EVIDENCE:

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

EVIDENCE:

2.2.2 Document Control (Mandatory)

The site has implemented its policy called POL-007 Document Control and Record Retention Policy 1/14/2021 rev 3, defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. A current list of all SQF documents is maintained and documents were observed to be stored securely and are accessible. The register of SQF documents is called REG-001 Document Control V33, and is found in the QA Office. Documents were reviewed once a year.

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

EVIDENCE:

2.2.3 Records (Mandatory)

The site has implemented its policy for verifying and retaining records found in the document called POL-007 Document Control and Record Retention Policy 1/14/2021 rev 3. The facility has documented procedures for recording production as well as the proper correcting and initialing of errors. These are based on customer, company, and regulatory requirements. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage, and have documented retention times. Records are maintained as specified by customers or regulations at a minimum of no less than the product shelf life. Records are retained for 3 years year in the SQFP office in locked file cabinets, then shredded (paper) or archived (electronic). Records Reviewed (FM-007.1 Food Bean Shipping Report, FM-026 Pest Control Trend Report, FM-025 Magnet Inspection Log V4, FM30.2 Cleanout/Product Switch (Product Flush), FM30.1, FM-014 Daily Pre-Operational and Post Operational Inspections.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

2.3.1 Specification, Formulation and Realization

Policy-008 Product Development and Realization Policy rev 1/14/2021 rev 4 addresses the product development and realization procedures. The policy focuses on the requirement to reassess the HACCP plan should any new products be formulated. Product development is not typically applied to this operation as it is a cleaner of raw agricultural commodities. Product specifications are dictated by the USDA grading system. The product is meant for further processing.

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

EVIDENCE:

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

EVIDENCE:

2.3.1.5 The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services)

POL-009 Raw Material and Packaging Specifications rev 1/15/2021 rev 5 outlines the methods and responsibilities for developing specifications. Specification development procedures are based on the USDA Grading Procedures for Soybeans and Corn; packaging suppliers supply the vendor specifications to the site. Register-003 of Raw Materials and Packaging rev 11/1/2018 is maintained; the register was sampled (Oats, Wheat, Soybeans, Corn) and was inclusive.

Raw and packaging materials are validated to ensure product safety, regulatory requirements, and fit-for-purpose requirements are met. These are done by means of testing the materials, and the receipt of Certificates of Compliance and/or Certificates of Analysis. Food contact packaging, super sacs, and paper bags have a certificate of conformance from Procon-Pacific (09/02/2016) and Farber (09/20/2016), indicating that it does not present a risk of chemical migration to food products. Product labels are approved by the SQFP, which is qualified to ensure they are accurate and meet regulatory requirements. Labels include information for transportation. The information included lot number, product name, booking number, and load date. There is a register of raw material, ingredients, and packaging specifications, called Reg-005 Approved Supplier Register that was found to be current. Descriptions of services provided by all contract service providers having an impact on food safety are documented in the SQFP office. A list of current contract service providers (REG-004 Contract Services Master Register) is maintained in the SQFP office and found to include providers of services including pest control (03/16/2022) and waste management (03/16/2022) and Contract arrangements reviewed during the audit and found to be satisfactory.

Finished product specifications are current, documented, and approved by the site's customers. Specifications include foreign material, damage, and splits. A register of all current finished product specifications is maintained in REG-002 Finished Product Register V3. Finished product specifications for #US #1 Soybeans and US #1 corn and Delco Gold (soybeans) were reviewed during the audit and contained the required information.

2.3.2.1 The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.2 Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.3 All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.4 Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.5 Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.6 Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency.
In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.7 Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.8 Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.9 Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable:
i. Microbiological, chemical, and physical limits;
ii. Composition to meet label claims;
iii. Labeling and packaging requirements; and
iv. Storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.10 Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained.

A list of all the above specifications shall be maintained and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Manufacturers

Not Applicable: The site does not use contract manufacturers.

2.3.4 Approved Supplier Program (Mandatory)

Approved Supplier Program 1/15/2021 Rev 3 covers the approved supplier program. Corporate maintains a list of approved suppliers that can supply grain to the site. Corporate sends this list to the site via email each night and these suppliers are verified and documented in the AGRIS system. Farm audits are conducted of the grain suppliers based on a schedule. All raw ingredients are received or rejected based on USDA grain inspection standards, as well as supplier risk of DON and/or Aflatoxin risk. Non-commodity suppliers are required to submit LOG, specifications, 3rd Party Audit Report, and Certificate of Insurance before approval. The procedure includes the emergency guidelines for the use of commodity suppliers; any emergency approvals have to get approval from corporate and pass satisfactory inspection and testing. The approved supplier program is reviewed annually. The site has REG-005 Approved Supplier Register rev 03/22/2023 lists the supplying company and the Item and contact. The site has identified all suppliers as low-risk based on the materials that are to be further processed. Suppliers of bags and totes were current.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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. The site primarily exports all products, and no product is sold in the US. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of newsletters from FDA, USDA, SQF Smart Brief Briefs, Neogen Mycotoxin reports. The site has a written provision that Eagle Certification Group, the certification body, and SQFI will be notified within 24 hours if a food safety event requiring public notification occurs.

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

EVIDENCE:

2.4.1.2 The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Good Manufacturing Practices (Mandatory)

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. These food safety pre-requisite programs are found in the Food Safety Manual. The effectiveness of the pre-requisite programs has been verified based on a schedule, which is found in the Internal Audit Schedule.

2.4.2.1 The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2.2 The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Safety Plan (Mandatory)

A Food Safety Plan has been developed, implemented, and maintained by the site. It is kept on file in Corporate Drive and maintained by the SQF Practitioner/Safety Director. 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 (VP, Superintendent, Food and Safety Manager, Facility Manager, Maintenance Manager and Clean Plant Manager) has been identified and trained, with documentation found in HACCP, SQF, and is PCQI trained (SQFP, Implementing SQF 8/17/2015, HACCP IHA approved 6/28/-6/30/2016, FSPCA PCQI, 6/28/-6/30/2016, Food Defense 6/14/2019, SQFP B/U IHA Basic HACCP 1/18/19-1/19/19, Food Safety for Carriers Awareness Module rev 9/15/2021). 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 (FSP-004 Flow Diagrams) for each process (GMO and Non-GMO) including all input and output steps in the process. The process flow has been verified by the site per the HACCP team on 07/11/2023. The food safety team has analyzed all hazards reasonably likely to occur including physical (metal and rocks), chemical (Aflatoxins), and microbiological (none) hazards for each process step, ingredient, and packaging. Control measures are in place to eliminate (such as magnets, receiving programs, and aflatoxin testing) or reduce the food safety risk to acceptable levels. The plan is verified as part of the SQF System and reviewed annually or when changes occur, by the food safety team with the last review date on 07/11/2023. National regulatory requirements for the site also require an FSPCA PCQI, 6/28/-6/30/2016, and a food safety plan, which was observed to be implemented. The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis. FSP-009 HACCP Validation Checklist dated 07/11/2023.

2.4.3.1 A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.2 The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.3 The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.9 The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.10 Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.11 For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.12 The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.13 The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.14 The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.15 Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.16 Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

RESPONSE: COMPLIANT

EVIDENCE: The HACCP/Food Safety Plan did not have any documented CCPs as determined by the hazard analysis.

2.4.3.17 Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4 Product Sampling, Inspection and Analysis

POL-021 Product Sampling, Inspection, and Analysis 06/12/2018 Rev 3 discusses methods and responsibilities for sampling products. All containers are sampled and retained for 30, 60, or 90 days. The procedure includes documentation about how raw materials and finished products are to be sampled. The site has Federal Grain Inspection Service (FGIS) employees on site. Sampling and Inspection are conducted by onsite USDA-trained inspectors (Kankakee Grain Inspection, expiry 12/31/2027) and carried out per Subpart D, G, J, and M of the USDA grain inspection standard. Records of released samples are kept in the Delong Database. The site uses Matrix Science International, for third-party testing if required. The lab is ISO 17025:2017 (cert valid till 10/22/24 cert number AT-1491) accredited. Aflatoxin testing ensures grains are less than 10 ppm and are tested onsite by Kankakee grain inspection.

2.4.4.1 The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented.

The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements.

Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.2 Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods.

Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses.

External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.5 Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelflife of the product.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.6 Records of all inspections and analyses shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.5 Non-conforming Materials and Product

The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in document Nonconforming Product or Equipment Policy POL-015 3/18/2021 rev 3, which were found to be properly implemented in the facility. Nonconforming product is tagged and/or held within the bin. Staff is trained on an annual basis on these policies. Release criteria and disposition instructions are documented. A register of nonconforming products exists and was reviewed in the form of the FM-009 Master Issue Log. Records from, 08/22/2023, 09/26/2023, and 10/04/2023 were reviewed.

2.4.5.1

The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure:

- i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and
- ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.5.2

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.6 Product Rework

Product rework procedures are detailed in POL-016 Product Rework Policy 3/19/2021 rev 5. Product rework is defined as recleaning. Rework is traceable via completion of FM-009 (Master Issue). Reworked products are sampled and graded and released per USDA grading and inspection service criteria. Records are maintained, no issues noted.

2.4.6.1

The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure:

- i. Reworking operations are overseen by qualified personnel;
- ii. Reworked product is clearly identified and traceable;
- iii. Reworked product is processed in accordance with the site's food safety plan;
- iv. Each batch of reworked product is inspected or analyzed as required before release;
- v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1;
- vi. Release of reworked product conforms to element 2.4.7; and
- vii. Reworked product does not affect the safety or integrity of the finished product.

Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7 Product Release (Mandatory)

The site has Product Release POL-017 rev 3, 03/19/2021 which outlines Product release procedures. All product is released after sampling and confirmed compliance with the relevant USDA FGIS grading standard (products are released based on US grading standards subpart D for corn, G for Oats, M for wheat, and J for Soybeans) by Kankakee, the onsite Grains Inspectors. Grain inspectors test each load, tote, or bag produced. An example from DL041322-10 on 04/13/2022 for #1 yellow soybeans was reviewed, and no issues were noted. Corn is tested for Aflatoxin before export. Products that do not comply with standards are placed on hold. Records are maintained in the Delong Database.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

2.4.8 Environmental Monitoring

The site has an exemption on file dated 03/20/2019, for Environmental Monitoring Program, because the product is a raw agricultural commodity and is further processed and USDA does not mandate environmental testing.

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

EVIDENCE:

2.5.1 Validation and Effectiveness (Mandatory)

The methods, responsibilities and criteria for ensuring the effectiveness of Good Manufacturing Practices, critical food safety limits and all other applicable elements of the SQF System have been documented and implemented. The site has POL-019 Verification and Validation Policy rev 3 03/19/2021 and was found to ensure that each has been implemented effectively. Methods to ensure that procedure or process changes are still effective in controlling food safety are in place and documented in POL-019 Verification and Validation Policy. There were no critical food safety limits. Records of all verifications of effectiveness and validations are maintained by the SQFP.

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

EVIDENCE:

2.5.2 Verification Activities (Mandatory)

The site has established a verification schedule, outlining the verification steps, procedures and responsibilities for each verification activity. The schedule is found in Verification Schedule (POL-019.1 V2) and maintained by the QA manager. The procedures for verifying Good Manufacturing Practices, critical control points, other food safety controls and regulatory compliance include utilizing authorized personnel to verify all monitoring activities. Records of verification of monitoring activities including inbound container inspections, pre-operational inspections and Weekly Inspections were reviewed.

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

EVIDENCE:

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

EVIDENCE:

2.5.3 Corrective and Preventative Action (Mandatory)

The site's Corrective and Preventative Action program is written in POL-020 Corrective and Preventative Actions Policy rev 5. It describes the methods and responsibilities for investigating, resolving and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Records of investigations and corrective actions (customer complaints, internal audit findings, non-conforming product or equipments etc.) were reviewed for the previous SQF audit. These were found to have reviews, investigations, corrective and preventative actions and resolutions documented. CAPAS were reviewed dated 02/28/2023, 06/12/2023, and 07/25/2023.

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

EVIDENCE:

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

EVIDENCE:

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 POL-022 Internal Audits and Inspection Policy rev 3, 05/20/2021. The Internal Audit Program is maintained by SQFP. The entire system is covered between February and October. The most recent full internal audit with a summary was completed from 01/04/2023 – 10/11/2023. The SQFP is trained in internal auditing (Internal Audit Training, 1/9/2017). Facility and equipment inspections are conducted regularly to ensure Good Manufacturing Practices are followed, which is documented in Weekly Inspection All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. The frequency of the audits is communicated to management; SQFP is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and where practical, audit areas independent of their function. Records of weekly Safety Inspections from 03/01/2023 to 05/05/2023 in the facility conducted were sampled and reviewed during the audit.

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

EVIDENCE:

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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

2.6.1 Product Identification (Mandatory)

POL-023 Product Identification Policy rev 3, 06/12/2018 details methods to identify products. Tracking of the commodity is done through the PLC via the AGRIS systems. Incoming materials are assigned lot numbers. Product is labeled per USDA standards per subpart D, and J. Product has sewn-in product labels that properly identify bagged soybean products. Totes are labeled and placarded. Tote bags are placarded with their contents. Outgoing material is tracked by the container numbers and booking numbers for each order. GMO and non-GMO labeling are visible, and integrity is maintained through dedicated systems. Elements of product identification were reviewed during each step of the process. The Product Identification Policy requires labels to be reconciled and issues investigated.

- 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

EVIDENCE:

- 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

EVIDENCE:

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 Product Trace Procedure rev 6, 06/25/2019. The product is traceable to the customer through the Delong Database. Any rework is identified to ensure traceability. The site has SOP-001 describing trace procedures and the effectiveness. The site is required to have 98-100% traceability in less than 4 hours. The effectiveness of the trace system is conducted at twice annually, as part of the product withdrawal and recall program. Records of the receipt, use and dispatch of finished product are maintained. Rework was observed to be identified to ensure traceability.

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

EVIDENCE:

2.6.3 Product Withdrawal and Recall (Mandatory)

The site has POL-024 Product Recall and Withdrawal Policy 01/09/2023 rev 6 describes the methods and responsibilities to initiate manage and investigate product withdrawals. The recall coordinator is the VP and Recall Coordinator. 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 Eagle Certification Group, 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 by Shell Corn on 09/28/2023. The product was loaded from 09/21 to 09/25 2023. 76 containers were loaded. 100 % was accounted for. The exercise took 3 hours. 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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

2.6.4 Crisis Management Planning

The site's written Crisis Management Plan is found in document POL-006 Crisis Management Plan rev 7, 01/09/2023. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The VP and Superintendent, has oversight of the Plan and a Crisis Management team has been identified and trained as evidenced 06/21/2023. 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 06/21/2023 involving a disaster scenario of high winds causing receiving legs to blow down that affected the food safety of the site's products. Records are maintained in the SQFP office, including follow-up corrective actions of this review and annual test of 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

EVIDENCE:

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

EVIDENCE:

2.7.1 Food Defense Plan (Mandatory)

The site has a Food Defense Policy Food Defense Policy rev 5, 09/21/2022, in which the procedures, 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, Superintendent 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. Training of key staff was conducted on 07/27/2023. An assessment of the plan was on 07/23/2023. The Food Defense Plan was last tested and challenged on 7/27/2023 (door card of an employee who was discharged) 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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

2.7.2 Food Fraud (Mandatory)

POL-041 Food Fraud (included vulnerability and mitigation) rev 2, 5/21/2021 detail the requirements for the food fraud program. The site completed and documented a vulnerability assessment utilizing the PWC SSAFE Food Fraud Vulnerability Assessment tool. The program identifies potential risks and motivations for food fraud and the site has a list of mitigation controls for grain elevators last reviewed on 07/23/2023. Raw materials and site vulnerabilities are discussed. The plan was reviewed and approved on 07/23/2023.

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

2.8.1 Allergen Management (Mandatory)

The site has POL-026 Allergen Management Policy rev 3, 05/21/2021 which outlines the methods and responsibilities to control allergens. The site produces soybean (allergen) and corn products. The site has uses dedicated equipment to prevent cross-contact with soybean and corn products. Procedures are documented to prevent the mix of the commodities, by using a lockout and flushing process on the corn and or specialty processes.

The site has an inspection (Verify the scale, legs, and augers are visually clear of allergenic materials) and cleanout procedure that is verified by a supervisor and documented on FM-030 Clean/Out Product Switch. The site uses color-coded utensils to handle the various commodities. Rework procedures are defined in policy-026 section 4.3.1 which addresses what products can be reworked and methods for tracking and tracing. The site has FM-030 Clean/Out Product Switch procedures requiring the Loadout Operator to document that the prior commodity is empty, and no product exists. Records of flush and cleanouts (FM-030.1 and FM-030.2 -PIT and Load Out) from 05/42/2023, 07/14/2023, and 08/15/2023 were reviewed.

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include:

- i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens;
- ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors;
- iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known;
- iv. A list of allergens that is accessible to relevant staff;
- v. The control of hazards associated with allergens and incorporated into the food safety plan, and
- vi. Management plans for control of the identified allergens.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.2 Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.3 Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.4 Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.5 Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.6 Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.7 The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.8 The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.9 The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

RESPONSE: COMPLIANT

EVIDENCE:

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:

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

EVIDENCE:

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 SQFP. HACCP training for personnel involved in the development and maintaining the food safety plan is administered. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering, Hygiene, GMPs, sampling and test methods (staff involved with sampling and testing), SQF and allergen management and interviews with scale operators, it was evident the proper refresher training has been conducted to ensure food safety, quality and the SQF system are maintained. Specific refresher training topics are covered on an annual frequency. The effectiveness of the facility 's training program was evidenced by interviews with plant employees.

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

EVIDENCE:

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

EVIDENCE:

2.9.2 Training Program (Mandatory)

The site has implemented a training program, entitled POL-027 Training Program rev 4, 12/21/2021, which covers the necessary competencies for plant personnel. Work instructions have been written explaining how tasks critical to maintaining food safety are performed. This program requires training to be conducted in Hygiene, GMPs, sampling and test methods (staff involved with sampling and testing), SQF and allergen management to ensure regulatory, food safety and all other requirements of the SQF System are met. The training language and materials are in English, the languages used in the operation and understood by all plant personnel. Interviews with cleaning plant and scale/pit operators, 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 throughout the year.

A training skills register is maintained by the SQFP and during the review was found to have a listing of the trainee, trainer, the description of the training, the date of training and verification by supervision that the training was completed. The site verifies the effectiveness of training by (quizzes). Plant employees interviewed on the production floor, cleaning plant, Scale/pit operators were found to have current training records on the register.

2.9.2.1 A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with:

- i. Implementing HACCP for staff involved in developing and maintaining food safety plans;
- ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
- iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces;
- iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment;
- v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products;
- vi. Environmental monitoring for relevant staff;
- vii. Allergen management, food defense, and food fraud for all relevant staff; and
- viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code.

The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.1.1 Premises Location and Approval

The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program. The site is registered with the FDA (expiry 12/31/2024) XXXXXXXX3622. The site has a City of Joliet Certificate of Occupancy issued on 9/15/2016.

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

EVIDENCE:

11.1.2 Building Materials

Floors are constructed of smooth and dense impact-resistant material and constructed for ease of cleaning and inspection that are effectively graded, drained, impervious to liquid, and easily cleaned. The walls were metal corrugate; ceilings and doors were of durable construction. 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. Overhead cleaning was found to be part of the master cleaning schedule. There were no overhead wastewater pipes. 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 corrugated steel, which is easily cleaned and prevents product contamination. Stairs, catwalks, and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces. No drains were observed at the facility. Product contact surfaces, surfaces not in contact with food, and storage areas are constructed of suitable materials including stainless steel/food-grade plastic/etc. They were observed during the audit to be properly maintained so that food safety is not compromised.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3 Lightings and Light Fittings

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting in the warehouse, processing area and any area where product is exposed is 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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.1.4 Inspection/ Quality Control Area

Product inspection areas were in the main office loadout building. The employees have access to handwashing facilities and waste is properly maintained to avoid product contamination. Sleds for sensory are housed in the unloading shed.

- 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

EVIDENCE:

11.1.5 Dust, Insect, and Pest Proofing

External windows, doors and other openings were generally in good condition and 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.

Minor nonconformance 11.1.5.2 during the audit of the new warehouse the auditor note the three dockdoors had gaps between the floor and the leveler plates about 1 inch. A potential risk for pest ingress.

- 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

EVIDENCE:

- 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: MINOR

EVIDENCE: Minor - during the audit of the new warehouse the auditor note the three dockdoors had gaps between the floor and the leveler plates about 1 inch. A potential risk for pest ingress.

ROOT CAUSE: The new warehouse addition was just finished in July of 2023. The dock levelers were not outfitted with proper weather/pest seal kits. They were cheap, not installed properly or damaged. Contractors and DeLong failed to verify light was not seen or spaces were not open to the outside.

CORRECTIVE ACTION: Checks to be added on the FM-015 weekly walk around. See attached updated form. Cleaning plant manager will check daily to make sure dock doors don't become a risk of pest ingress. Item to be checked on-going with weekly walk around form and again in May 2024 to ensure that audit point remains closed.

VERIFICATION OF CLOSEOUT: Containment, root cause analysis, and corrective action plan acceptable

COMPLETION DATE: 11/13/2023 **CLOSEOUT DATE:** 11/15/2023

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

EVIDENCE:

11.1.6 Ventilation

Adequate ventilation was available, where needed, in enclosed processing and food areas. Ventilation equipment was seen to be adequately cleaned, insect-proofed and located to not pose a risk of contamination.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.1.7 Equipment and Utensils

The site is well constructed and designed in a way to prevent product contamination. SOP-003 rev 2, 07/22/2021 Equipment, Utensils, and Protective Clothing: Specifications and Purchasing Requirements define specifications for clothing and utensils. Materials must be food-grade and evaluated for sanitary design. Equipment, cleaners, and magnets are constructed of appropriate materials and hygienically designed. No water is used at the site, this is a dry facility. The site has two rooms for cleaning soybeans and corn (GMO and Non-GMO). Nonconforming equipment is repaired or removed from service. Repairs are tracked through work orders.

Equipment and utensils, 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. Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials. They were observed during the audit to be properly maintained so that food safety is not compromised. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. 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. Equipment and utensils are cleaned according to the MaintainX (daily dry clean only) and validated by visual inspections to prevent microbiological or cross allergen contamination.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.1.8 Grounds and Roadways

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 ponding of water was observed. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

11.1.8.1 A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8.2 Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8.3 Paths from amenities leading to site entrances shall be effectively sealed.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1 Repairs and Maintenance

The site has a program POL-028 Maintenance Program rev 4, 07/22/2021. that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. The site has a schedule for planned Maintenance activities (Master Preventive Maintenance Schedule) located in a binder, which includes adequate documentation of completed tasks (FM-022). Examples included: Maintenance personnel are trained in good manufacturing practices and food safety. Maintenance and repairs to be undertaken in any processing, food handling or storage area is communicated to site supervisors including any potential hazards such as loose wire, damaged lighting and loose overhead objects that poses a threat to product safety. The site has post-maintenance (in SOP POL-028 Maintenance Program) and clean-up procedures which are required to be completed on each WO. Temporary repairs (section 4.5 of the SOP), if required, are appropriate, 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 in properly marked chemical racks. Paint is not used on food contact surfaces and any paint in processing areas was noted to be in good condition with no observed flaking.

11.2.1.1 The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.2 Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded.
The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.3 Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.4 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.5 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.6 Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.7 Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.8 Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.2 Maintenance Staff and Contractors

Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures by means of GMP Policy displayed in the front office. Periodic inspections are completed to ensure loose parts and other materials are not potential contaminants. 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 the resumption of operations, documented in SOP POL-028 Maintenance Program and on FM-021 Work Order Form. Records were reviewed during the audit.

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

EVIDENCE:

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

EVIDENCE:

11.2.3 Calibration

A policy defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented.

The facility has developed a calibration schedule for all devices listed. This documentation is located in Calibration Policy POL-029 rev 3, 07/22/2021. POL-029.1 Calibration Schedule outlined the schedule equipment, location and frequency of the calibration required. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. A review of the calibration records for magnets (pull strength) on 03/02/2023 (annual) and moisture machine on 02/03/2023 (annual) confirms the schedule is being followed. Grain scales can only be adjusted by the USDA Grain inspection service per law. The policy includes the procedures to address the disposition of any affected product should inspection equipment be found to be out of calibration, written in Non-Conforming product and Equipment SOP. Inspection and testing equipment is protected from damage or unauthorized use. Equipment is calibrated against national or international standards. Truck scales were calibrated 02/02/2022 (every 2 years),

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

EVIDENCE:

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4 Pest Prevention

A policy defines the site's program for pest prevention POL-030 Pest Prevention Policy rev 5, 11/08/2022 and the appropriate follow-up to pest prevention issues that may occur. The program was observed during the audit to be effectively implemented. The premises were free of waste and debris as observed during the interior and exterior tours. No pest activity was identified or noted during tours, that presented a risk for product contamination and corrective action and record-keeping procedures are in place should this occur. A Pest Contractor has been contracted for pest prevention and an updated scope of service dated 01/03/2018 defines the methods of pest prevention, the frequency of interior and exterior inspections and targeted pests. A current site map dated 06/14/2023 is accurate showing the location of 38 external and 61 internal devices. All devices were serviced weekly. A pesticide application log gives details and dates of all chemical usage. License of the Pest Contractor expiry 12/31/2024 from local authorities are current and indicate employees are trained and competent. A list of chemicals used by the Pest Contractor is found in the pest control binder and included an approved list (dated 01/04/2023) of pesticides and includes SDS information. Examples included WeatherBlox XT, Suspend SC and Terad 3 Blox. An Organic Program Checklist (01/03/2018) was also included due to the organic grains produced. 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. The trending of the pest activity frequency is documented in the pest control binder. Employees were trained on pest activities. Quarterly assessments were conducted (last assessment on 09/06/2023). No animals were observed on-site in food handling and 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5 Cleaning and Sanitation

The site has a Cleaning and Sanitation Program POL-032 Sanitation Program rev 3, 7/23/2021 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 and who is responsible. The site has POL-032.1 Master Cleaning Schedule that documents the cleaning at the site. Schedules and SSOPs are documented in MaintainX, and app-based tools includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan for 08/18/2023, 09/12/2023, and 10/03/2023 showed cleaning tasks were completed as scheduled. 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. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. Randim Pre-operational inspections for July, August and September 2023 were reviewed and had proper corrective actions documented as required. Cleaning is validated weekly during the SQFP walk around per Weekly Safety Inspection Report FM-015. Chemical Control Policy POL-036 rev 3 outlined the management of approved chemical usage. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Chemicals Clorox and Pinesol were observed to be included on a list of approved chemicals, labeled consistent with regulations, and had SDS on hand, these cleaners were not used on food contact surfaces. Dispensed cleaning chemicals were properly stored and identified. Main Office and load out office were maintained on a Cleaning Log by an outside cleaning service.

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

11.2.5.5 Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.7 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.8 Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.9 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1 Personnel Welfare

A Good Manufacturing Practice policy for all employees has been documented and implemented. 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. A medical screening procedure (Risk Assessment on Medical Screening dated 12/2/2021) was in place for all employees, visitors, and contractors who handle exposed product or food contact surfaces. The site had a score of 16 and 25 on the matrix and was considered "hazard is considered insignificant".

The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. Plant employees were trained through "Safety Made Simple". The policy includes (POL-033 GMP Policy rev 4, 11/08/2022) 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. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements.

11.3.1.1 Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed.

Code Amendment #1

A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2 Handwashing

A policy covering hand washing requirements has been documented and implemented. 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. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted in bathrooms. Employees are required to wash their hands if gloves are worn. There was a risk assessment dated 02/03/2022 regarding handwashing and hairnets. The site handles raw commodities that are further processed to remove farm debris and processed at the customer site. There is no contact with the grains. The site uses hand wipes (Alpet D2) for cleaning and sanitizing. A hazard rating of 16 & and 25 "Insignificant". Interviews conducted with cleaning operators and load-out operators during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit.

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3 Clothing and Personal Effects

A policy, based on a documented risk assessment, found in POL-033 GMP Policy rev 8/7/2018, defines the site's clothing requirements and has been implemented. There was a risk assessment dated 02/03/2022 regarding handwashing and hairnets. Protective clothing meets documented specifications, is easily cleaned, and is made of material that will not contaminate food. Employees store clothing on racks adjacent to access points when going on breaks. Clothing including shoes is required to be clean at the commencement of the shift and changed or replaced if excessively soiled. Employees were observed to comply with the clothing requirements of the facility. Non-disposable gloves and aprons were observed to be cleaned and properly stored per site policies. 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. Prescribed Medical Alert bracelets or jewelry for religious or cultural reasons can be allowed by the policy when approved by management. Protective clothing was not used, and employees wore clean and well-maintained street clothes. Disposable gloves and aprons were not used.

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

EVIDENCE:

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.4 Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

11.3.4 Visitors

A policy defining visitor and contractor requirements found in FM-029 Visitors GMP and Safety Requirements pamphlet has been 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.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.3.5 Staff Amenities (change rooms, toilet, break rooms)

Employee bathrooms and break rooms were observed to be appropriately lit, cleaned and ventilated, and available for all personnel at the facility. Restrooms and washrooms were observed to be separate from food processing and handling areas. 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. 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.

Lunch rooms that are properly separated from production are available, well-lit, properly ventilated, and appropriately sized for the number of facility employees. Lunch rooms include hot and cold potable water, food storage areas, and refrigerators with hand and utensil washing capabilities. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunch rooms. Lunch rooms were observed to be clean and well-maintained during the audit tours.

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

- 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

EVIDENCE:

11.4.1 Staff Engaged in Food Handling and Processing Operations

Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed when not in use. Waste was contained and disposed of per site policy and cleaning practices. False fingernails or fingernail polish, long nails, and false or extended eyelashes are prohibited, and no violations were noted. Packaging Material, products, and ingredients were in appropriate containers, labeled containers, and kept off the floor. The GMP policy prohibits smoking, eating, drinking (except for water in clear water bottles), or spitting in the facility. Smoking is prohibited in all areas of the site. 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. Sensory evaluation is not performed. 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

EVIDENCE:

- 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

EVIDENCE:

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

EVIDENCE:

11.5.1 Water Supply

POL-034 Water Quality Policy rev 3, 7/23/2021 covers water testing and Potability procedures. Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from the City of Joliet, IL (2022 report). It was determined that there was adequate hot and cold water for cleaning and processing. Delivery of water within the premises complies with site policy. Backflow devices are installed on water lines. Backflow devices are tested annually, and the last test was conducted on 009/22/2023. Hose stations, taps, and other water sources are designed to prevent backflow or back siphonage. A contingency plan was in In Water Quality Policy POL-034 place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use. Portable sinks will be provided by Service Sanitation Company. Water was not used in the process or as an ingredient only employee use and janitorial.

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

EVIDENCE:

11.5.1.2 Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1.3 Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1.4 The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2 Water Treatment

Water was not used as an ingredient or treated, only for employee use.

11.5.2.2 Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

11.5.3 Water Quality

Water used in janitorial cleaning or handwashing is monitored periodically for potability by the site. Samples from inside the facility are sent to an outside lab for analysis. Based on risk, the site's testing frequency is set at a minimum frequency of annual. The last potability test was conducted on 09/27/2023 (Coliforms- results - absent).

11.5.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for:

- i. Washing, thawing, and treating food;
- ii. Handwashing;
- iii. Conveying food;
- iv. An ingredient or food processing aid;
- v. Cleaning food contact surfaces and equipment;
- vi. The manufacture of ice; or
- vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

11.5.3.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.4 Ice Supply

Ice is not used at the facility.

11.5.5 Air and Other Gasses

Compressed air or other gasses was not used.

11.6.1 Receipt, Storage and Handling of Goods

The site has implemented an effective documented policy for the receipt, storage, and transport of raw materials, ingredients, packaging, equipment, and chemicals. This policy Shipping and Receiving Program POL-037 was reviewed during the audit and found to be acceptable. Dry ingredients and packaging were observed to be stored separately from unprocessed raw materials, and frozen and refrigerated items. The received data for grains is documented in AGRIS. The Longest storage time for the product is 1 month on bag product. Typical bins turnover within the week. PLC monitors and directs bin usage to prevent violating FIFO principles.

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

EVIDENCE:

11.6.1.2 Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.3 The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.4 Procedures shall be in place to ensure that all ingredients, materials, work-in-progress, rework, and finished product are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.2 Cold Storage, Freezing and Chilling of Foods

Not Applicable: Cold storage is not required. All products are stored at ambient temperatures.

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. Racking is designed and constructed from impervious materials and located so storage areas can be cleaned and inspected. Forklifts and other vehicles in processing areas and storage areas were observed to not present a food hazard.

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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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. No processing utensils or packaging were stored next to chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment (located in the storage container). The site has Chemical Register REG_008 SDS Table of Contents. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility. SDS and the label declaration and/or documented approval for the chemical's intended use were reviewed for Clorox Bleach, One-Sol, and JAX Lithium Grease. The outside janitorial service provided cleaning of staff amenities and restrooms. A spill kit for hazardous chemicals was located in the maintenance shop and in a 20 ft. container outside of the facility.

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

- 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

EVIDENCE:

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 Shipping and Receiving Program POL-037. 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. Documentation was reviewed for 08/28/2023, 09/12/2023, and 10/23/2023. It was observed during the audit tours that loading practices do not expose products to detrimental conditions. Trailers and vehicles used for transport were observed to be properly secured from tampering by the use of seals.

- 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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE:

11.7.1 High-Risk Processes

Not Applicable: The site does not produce high risk products.

11.7.2 Thawing of Food

Not Applicable: No thawing was required.

11.7.3 Control of Foreign Matter Contamination

Policy POL-039 Foreign Matter Policy rev 3, 9/23/2021 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 glass register is current as of 10/14/2022. 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 10/30/2023 was reviewed and found to be completed as scheduled. 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 documented a knife policy, and knives are controlled, cleaned, and required to be in good condition. Periodic maintenance inspections include looking for loose objects and potential contaminants from overheads.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4 Detection of Foreign Objects

The methods and frequency for monitoring, maintaining, and calibrating FM devices are documented in POL-039 Foreign Matter Policy rev 3, 9/23/2021. No metal detectors were present, but plate magnets were utilized. Magnets were monitored weekly (FM-025 Magnet Inspection Log) and were verified by operations personnel. Pull Strength test results were on file for magnets, no corrective actions were required. Magnet inspection and cleaning logs were documented and reviewed during the paperwork review.

11.7.4.1 The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.2 Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.4 Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4.5 In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1 Waste Disposal

A policy defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented, is found in Waste Program POL-040 rev 09/23/2021. 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. The site does not require the disposal of trademarked materials. The site does not supply inedible waste materials for animal feed.

11.8.1.1 The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.2 Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.3 Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.4 Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.5 Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.8 Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE:

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

EVIDENCE: