



# SQF Food Safety Audit Edition 9

## Taylor Logistics Inc. - Taylor Logistics Inc.

### Summary

**AUDIT DECISION**  
**CERTIFIED**

**CERTIFICATION NUMBER**  
**35830 | 159639**

**AUDIT RATING**



**Excellent**

**DECISION DATE**  
**07/12/2022**

**AUDIT TYPE**  
**RECERTIFICATION**

**RECERTIFICATION DATE**  
**05/15/2023**

**AUDIT DATES**  
**06/01/2022 - 06/02/2022**

**EXPIRATION DATE**  
**07/29/2023**

**ISSUE DATE**  
**07/14/2022**

### Facility & Scope

**Taylor Logistics Inc. (54838)**

Taylor Logistics Inc.  
9756 International Blvd.  
Cincinnati, OH 45246  
United States

**Web Site:** <http://www.taylorlogistics.com>

**Food Sector Categories:**

26. Storage and Distribution

**Products:**

Storage and Distribution: Confectionaries, Bulk Ingredients, Soda Beverages, Pet Food, Cereals, Canned Goods, Bottled Goods, Bagged Products, Totes, Drums Dry cereal, Dry confections

**Scope of Certification:**

Storage and Distribution: Confectionaries, Bulk Ingredients, Soda Beverages, Pet Food, Cereals, Canned Goods, Bottled Goods, Bagged Products, Totes, Drums Dry cereal, Dry confections

### Certification Body & Audit Team

**Mérieux NutriSciences Certification**

401 N Michigan  
Suite 1400  
Chicago, IL 60611  
United States

**Web Site:** <https://www.merieuxnutrisciences.com/>

**CB#:** CB-1-Mérieux

**Accreditation Body:** JAS-ANZ

**Accreditation Number:** Z3720906AB

**Lead Auditor:** Blackburn, Bart (208969)

**Technical Reviewer:** Lastra, Jaime (10049)

**Hours Spent on Site:** 17

**Hours of ICT Activities:** 0

**Hours Spent Writing Report:** 8

## 12.2.5 Cleaning and Sanitation

MINOR: There were a number of areas in the warehouse with accumulated cobwebs, including around the windows on the south side windows and along the perimeter around upright posts and on high, difficult to reach walls. The site has a written 'Sanitation Program', defining methods to provide a "SQF environment for the storage of our customers' products." Sanitation is the responsibility of the SQF Practitioner. There is a 'Master Cleaning Schedule' for other-than-daily tasks, scheduled for monthly, quarterly and annual completion. These include interior and exterior cleaning tasks. The schedule is up to date and initialed as verified by the SQF Practitioner. Additionally, a 'Daily Cleaning Schedule' is used to assign and document trash, floor and janitorial tasks, also initialed as verified and up to date. An 'MHE Cleanliness Check' form is completed monthly to inspect forklift equipment for cleanliness. Other than the janitorial tasks, all cleaning is done by site personnel. Cleaning chemicals are segregated from storage areas. A list of approved cleaning chemicals and inventory was presented. Cleaning utensils were properly stored on designated shadow boards. Excepting the minor finding noted above, the facility is maintained extremely clean and tidy.

- 12.2.5.1** The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities 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 cleaning; v. Validation of cleaning procedures; 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:** MINOR

**EVIDENCE:** MINOR: There were a number of areas in the warehouse with accumulated cobwebs, including around the windows on the south side windows and along the perimeter around upright posts and on high, difficult to reach walls.

**ROOT CAUSE:** Inconsistencies in warehouse cleaning.

**CORRECTIVE ACTION:** Windows sweep weekly added to Master Cleaning Schedule doc. # 11.05 Building concrete panels resealed in 05 and 06/2022. Resealed dock door # 19 thru 26 by Equipment Depot. Check into anti web spray.

**VERIFICATION OF CLOSEOUT:** Review of provided evidence

**COMPLETION DATE:** 06/17/2022    **CLOSEOUT DATE:** 06/22/2022

## Audit Statements

<b>SQF Practitioner Name</b>	Name the designated SQF Practitioner <b>RESPONSE:</b> Rick Johnson
<b>SQF Practitioner Email</b>	Email of the designated SQF Practitioner <b>RESPONSE:</b> rick@taylordist.com
<b>Opening Meeting</b>	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) <b>RESPONSE:</b> Rick Johnson: SQF Coordinator, Lynda Marts: Operations Manager, Mike Willson: QA Manager, Leslie Walker: HR Manager, AJ Raaker: Director Warehouse Operations, Bart Blackburn: Auditor
<b>Facility Description</b>	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details) <b>RESPONSE:</b> Taylor Logistics is a 192,000 square feet center 3rd party distribution center handling a variety of ambient stored products, originally constructed in 1990. There are 26 dock doors, 21 of which are used for shipping and receiving. The site employs 31 full-time employees, 25 of whom are warehouse personnel. Temporary employees are employed as needed. The site operates operating 2 shifts, 5 days per week with some 6th day overtime. Distribution includes ecommerce orders and a kitting operation for variety packages. There is 1 dedicated sanitation person. Floors in the facility are sealed 7" concrete. Walls are tilt concrete. The roof is conventional steel overlaid with rubber membrane with stone ballast, replaced in 2005. The site has completed corrective actions from the previous audit and has not had any recalls initiated from the practices at this location since the previous audit.
<b>Closing Meeting</b>	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) <b>RESPONSE:</b> Rick Johnson: SQF Coordinator, Lynda Marts: Operations Manager, Mike Willson: QA Manager, Bart Blackburn: Auditor
<b>Auditor Recommendation</b>	Auditor Recommendation <b>RESPONSE:</b> Recertification

## Section Responses

### 2.1.1 Management Responsibility (Mandatory)

There is a formal 'SQF Management Policy' 2021-07-23 implemented for the site. The policy state's the company's commitment to the use of HACCP based food safety and quality culture, employee training and to providing resources to facilitate continuous improvement in the organization. The policy is signed by the company President and is prominently displayed in the employee break room area. A number of food safety and quality metrics are tracked and reported. Some of these include "E-com Inspections" for missing items and customer information, put-away accuracy, picking & order accuracy and others. Weekly team huddles are used to communicate food safety & quality issues and to gather feedback from associates. Job descriptions with responsibilities, alternate responsibilities and direct reporting assignment are on file and were available for review, including for the requested 'SQF Practitioner' and 'Warehouse Associate' responsible for loading and unloading. A site level organization chart was presented, identifying the SQF Practitioner position that reports directly to the Operations Manager. The QA Manager is the designated backup SQF Practitioner for the site. HACCP training certificates were presented for both of these full-time personnel, completed on 2019-01-09 and 2012-10-10, respectively. Training programs are implemented for all personnel, completed and documented using a computer assisted learning tool. The site is aware of the requirement to provide blackout dates if scheduled for an unannounced audit.

- 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 language(s) understood by all site personnel.

**RESPONSE:** COMPLIANT

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

**2.1.1.5** The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility in relation 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: Storage and Distribution and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

## **2.1.2 Management Review (Mandatory)**

A formal 'Management Review' meeting is documented each month, covering company goals, safety, training, capital investments, process improvement, measurables, food safety systems, customer complaints and other SQF elements, as well as corrective and preventive actions that are measured and reported. The SQF Practitioner and backup are participants in the monthly review to update management regarding the SQF system. Management reviews reports for SEP 2021, DEC 2021, MAR 2022 and APR 2022 were presented during the audit.

**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 review. Records of all management reviews and updates shall be maintained.

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

### 2.1.3 Complaint Management (Mandatory)

A 'Customer Complaint' SOP defines the proper process for handling all warehouse complaints. They are received generally by email through the Customer Service department, passed to the QA Manager through daily meetings or through the issuance of a corrective action incident, tracked through the 'CAPA' program. A spreadsheet listing various complaints was presented that includes the date of the incident, root cause, date of correction, detail comments, status and others. A 'Corrective and Preventive Action Report' was presented for a specific complaint regarding broken packaging, received on 2021-12-03, that included a root cause analysis and preventive action plan.

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 stored or handled on-site shall be documented and implemented.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### 2.2.1 Food Safety Management System (Mandatory)

Food safety and quality SOPs and other documents are maintained in the 'Sharepoint' database, including the policy statement previously noted, organization chart, food safety plan, good distribution practices (GDPs) and others. Information was current and accessible by the site, demonstrated during the audit. The 'Change Management Program' is a standardized system for reviewing and approving changes, applicable to changes in SOPs as well.

2.2.1.1 The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Storage and Distribution shall be maintained in electronic and/or hard copy documentation. It 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 site and to the country of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, pre-requisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development and the implementation, maintenance, and control of the SQF System.

**RESPONSE:** COMPLIANT

2.2.1.2 Food safety plans, Good Storage and Distribution 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 Storage and Distribution Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the changes shall be documented.

**RESPONSE:** COMPLIANT

### 2.2.2 Document Control (Mandatory)

There is a 'Document Control' program that describes the process for creating, updating and approving documents used by the organization. A register of documents is maintained. Documents are assigned a version number, revision date and record of changes, documented on each individual policy or form. The documents are maintained in the Sharepoint database. Changes are reviewed by the QA Manager.

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

**RESPONSE:** COMPLIANT

### 2.2.3 Records (Mandatory)

The requirements for how records are to be maintained, completed and reviewed are included in the 'Document Control Program'. Filled out records must be completed in ink and prohibits the use of "white out" for corrections. They are to be retained for a period of at least 3 years in paper or electronic form. It is the responsibility of the SQF Practitioner to ensure all forms and checks sheets are current and accessible. The following records were reviewed during the audit: HACCP plan and associated documents, pest control service reports, policy statement, KPI reports, HACCP training certificates, management review, customer complaints, list of approved suppliers, hold log, destruction log, validation & verification logs, internal audit, internal inspections, corrective action log, food fraud assessment, crisis scenario exercise, trace exercise, mock recall, scale calibrations, maintenance records, contractor training, scale calibrations, cleaning records, master cleaning schedule, backflow tests, inbound inspections, outbound inspections, glass spill report, destruction form.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### 2.3.1 Product for Storage and Distribution

A 'Storage Practices' SOP defines the correct storage procedures for all products, including food, medical devices, drugs products and other items. It includes provisions for stock rotation, code dates, sanitation expectations, potential foreign materials and others. The program addresses the requirements for some items to be stored in a temperature controlled room set at 66F, for strictly quality purposes not related to food safety.

2.3.1.1 Product handling and storage requirements for all products received, stored, and intended for distribution, shall be documented, current, approved by the site and their customer (if applicable), accessible to relevant staff, and include temperature requirements, storage conditions, packaging requirements, and handling and transportation conditions.

**RESPONSE:** COMPLIANT

### 2.3.2 Supplier Approval and Incoming Supplies

There is a 'Customer & Supplier Approval' SOP 2022-03-24. The program addresses various types of suppliers, including customers, general suppliers, packaging suppliers and contractors. Being a 3rd party warehouse, material suppliers are dictated by the customer. A list of approved suppliers was presented, including service contractors, supply vendors and others. Unless suppliers are listed in the system, purchase orders cannot be issued. There is a provision in the SOP for temporary non-approved source suppliers, given a high risk rating pending monitoring and completion of an approval process. Approved cleaning chemicals are kept on a register and SDS are kept on file for each. Specifications for food items are approved by the customer.

2.3.2.1 The methods and responsibility for developing and approving product descriptions shall be documented. Product descriptions for all incoming supplies used by the site but not intended for distribution, including, but not limited to hazardous chemicals, ice, food packaging materials, or janitorial supplies that are used on-site and impact on product safety shall be documented and kept current.

**RESPONSE:** COMPLIANT

2.3.2.2 All incoming supplies shall comply with the relevant legislation.

**RESPONSE:** COMPLIANT

2.3.2.3 Incoming supplies shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of incoming materials shall include a review of the product description to determine conformance.

**RESPONSE:** COMPLIANT

2.3.2.4 Incoming goods that may have an impact on product safety shall be supplied by an approved supplier. The responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.

**RESPONSE:** COMPLIANT

**2.3.2.5** Incoming goods received in emergency situations shall be acceptable provided they are inspected or analyzed before use and the supplier has been evaluated.

**RESPONSE:** COMPLIANT

**2.3.2.6** Incoming goods and packaging received from other sites under the same corporate ownership shall be subject to the same product requirements and approved supplier requirements as all other material providers.

**RESPONSE:** COMPLIANT

**2.3.2.7** Specifications, product requirements, and incoming supplies shall be reviewed annually or as changes occur.

**RESPONSE:** COMPLIANT

### **2.3.3 Contract Service Providers**

The 'Contract Service Providers Requirements and Management' 2019-04-30, defines protocols for managing and approving contractors regarding food safety and quality. A list of contractors was presented and included but isn't limited to MHE maintenance, pest control, approved carriers, waste management, outside storage. Contractors entering the facility are required to review and sign acknowledgement of hygiene practices.

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

**RESPONSE:** COMPLIANT

**2.3.3.2** Contracted services that have an impact on product safety shall be reviewed against the description. The methods and responsibilities for contracted services review shall be documented and validated as needed or at a minimum of annually.

**RESPONSE:** COMPLIANT

**2.3.3.3** A record of all contract service descriptions that have an impact on product safety shall be maintained.

**RESPONSE:** COMPLIANT

### **2.3.4 Contract Third-Party Storage or Distributor**

The 'Contract Service Providers Requirements and Management' SOP 2019-04-30 also addresses the management of 3rd party storage and distribution. The site does not currently use any 3rd party storage for food items. 3rd party distributors are used on a regular basis. A 'Carrier Rate and Load Confirmation' form is issued for each assigned transport that includes "pickup instructions" requiring that no reefer trucks accepted, only clean, dry, food grade with "barn" doors. Two examples dated 2022-05-02 and 2022-05-20 were presented as examples.

**2.3.4.1** The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.

**RESPONSE:** COMPLIANT

**2.3.4.2** The site shall: i. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel; ii. Verify compliance with the SQF Code and that all customer requirements are being met at all times.

**RESPONSE:** COMPLIANT

**2.3.4.3** Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.

**RESPONSE:** COMPLIANT

### **2.4.1 Food Legislation (Mandatory)**

The site is registered as a food facility with FDA, expiring 2022-12-31. The SQF Practitioner is subscribed to USDA notices for recalls and to SQFI newsletter, demonstrated during the audit. The 'Crisis Management' SOP has provisions to contact SQFI and the certification body in the event of a food safety event within 24 hours.

**2.4.1.1** The site shall ensure that food stored and delivered to customers is handled in a manner that complies with the relevant legislation in the country of its production and destination.

**RESPONSE:** COMPLIANT

**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

**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](mailto:foodsafetycrisis@sqfi.com).

**RESPONSE:** COMPLIANT

## **2.4.2 Good Storage and Distribution Practices (Mandatory)**

Various program addressing good distribution practices are included in the quality policies, including for sanitation, hygiene, storage practices, pest control, foreign materials, cross-contamination and others. The 'Personnel Hygiene' policy includes provisions for hand washing, disease and exposed wounds, jewelry and smoking. The facility has not exempted any segments of the SQF code or any areas of the facility.

**2.4.2.1** The site shall ensure the Good Storage and Distribution Practices described in Module 12 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 to ensure that food safety is not compromised.

**RESPONSE:** COMPLIANT

**2.4.2.2** The Good Storage and Distribution Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented.

**RESPONSE:** COMPLIANT

## **2.4.3 Food Safety Plan (Mandatory)**

The Food Safety and Quality HACCP Plan, Revision 25, 2021-08-03, was documented and implemented, completed using Codex Alimentarius principles. The Food Safety Team meets at least annually at the site, most recently documented on 2021-08-03, comprised of the VP Warehousing, Director of Warehouse Operations, SQF Practitioner, Training Manager, Operations Manager, QC Manager, Billing Manager and QA Manager. The plan covers the scope of certification for storage and distribution of product. A product description includes the product name(s), how the product is to be used, packaging, special distribute control and intended use. These include finished product and bulk ingredients, stored with some non-food items. Food items are ready-to-eat (RTE) or to be used as an ingredient for further processing. Packaging includes consumer packaging, bagged products, bulk packaging, totes and drums. All is stored at ambient temperatures, some in an air conditioned storage room for quality purposes. Food products are for the general population and pets. Products include ingredients, packaging, baby food, snacks, beverages, oils, health supplements and other items. The operation includes the kitting of unexposed food products into variety packages. Some items are sold in ecommerce. An updated process flowchart includes steps of the process from incoming products, cross-docking, temperature controlled storage, value added kitting, returns and others. A comprehensive hazard analysis evaluates the potential for physical, biological and chemical hazards, including those for foreign materials, allergens, mislabeling and others. There are NO CCPs identified in the hazard analysis. There are no critical control points identified through the hazard analysis.

**2.4.3.1** A hazard and risk management system shall be developed and take into consideration relevant legislation in all countries of operation. The system shall be risk based, systematic and comprehensive, and based on HACCP or preventive controls. The food safety plan shall be effectively implemented, maintained, and outline the means by which 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 food safety plan may be required to cover all products included in the scope of certification.

**RESPONSE:** COMPLIANT

**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, storage and distribution, and facility /maintenance knowledge of the relevant 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

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

**RESPONSE:** COMPLIANT



**2.4.3.4** Product requirements shall be developed and documented for all products (or groups of products) included in the scope of the food safety plans. This shall reference the product descriptions (refer to 2.3.2.1) plus any additional information relevant to product safety, such as temperature for storage, how the product is packaged, allergen requirements, raw or cooked, etc.

**RESPONSE:** COMPLIANT

**2.4.3.5** 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 material, packaging, service inputs (e.g., water, steam, gases as appropriate), scheduled process delays, and all process outputs including waste, rework, and recoup. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.

**RESPONSE:** COMPLIANT

**2.4.3.6** 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 food products received and stored.

**RESPONSE:** COMPLIANT

**2.4.3.7** The food safety team shall conduct a hazard analysis for every identified hazard, to identify which hazards are significant. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

**RESPONSE:** COMPLIANT

**2.4.3.8** 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

**2.4.3.9** Based on the results of the hazard analysis (refer to 2.4.3.7), 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 (e.g., a preventive control {PC} or critical control point {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

**2.4.3.10** For each identified step requiring control (e.g. PC or CCP) the food safety team shall document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated 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 2.5.1.1).

**RESPONSE:** COMPLIANT

**2.4.3.11** The food safety team shall develop and document procedures to monitor identified steps requiring control (e.g. PC or CCP) to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the testing frequency.

**RESPONSE:** COMPLIANT

**2.4.3.12** 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 an identified step requiring control (e.g. PC or CCP). The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

**RESPONSE:** COMPLIANT

**2.4.3.13** 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

## **2.4.4 Non-conforming Product and Equipment**

The 'Non-Conforming Products and Equipment Hold' SOP rev9 describes the procedure for placing food products on hold to ensure proper tracking and disposition. Affected products are labeled with a "Customer Hold Do Not Ship" placard. The inventory is blocked in the inventory management system in an "OH" status, making it unavailable for transactions in the warehouse. An example "Tomato Mushroom Puffs best by 08 12 2022" product was observed in the warehouse during the inspection. The warehouse personnel demonstrated the status of the product in the system, tracked using the license plate label attached to the product. There was a recent example of a tote of cereal product that was damaged and placed on hold. Record of destruction was on 2022-05-30.

**2.4.4.1** The responsibility and methods outlining how non-conforming product, raw materials, ingredients, work-in-progress, packaging, or equipment detected during receipt, storage, handling, or delivery and including food found to be damaged and/or returned from customers is handled 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 delivery, or risk to the integrity of the product; ii. Non-conforming equipment is effectively identified, repaired, or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and iii. All relevant staff are aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## **2.4.5 Product Recoup**

A 'Returns' SOP defines the process for receiving and inspecting product returned from either e-commerce or other business. Returned products may be recouped following strict requirements that product isn't damaged, tampered with or otherwise unfit to return to inventory. Some products in the temperature controlled room, where returned products are handled, were slated for recouping. There is a process for assigning a new internal lot code to facilitate management of the inventory. The product is traced by its original best by date. It may be repacked or used as a component of kit or variety packs.

**2.4.5.1** The responsibility and methods outlining how product is recouped shall be documented and implemented. The methods applied shall ensure: i. Recouping operations are conducted by trained personnel; and ii. Recouped product is traceable.

**RESPONSE:** COMPLIANT

## **2.4.6 Product Release (Mandatory)**

There are no critical control points in the process for which food safety evaluation and release would be applicable. Trailers are inspected prior to shipment on the 'Inbound / Outbound Inspection Form'

**2.4.6.1** The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel.

**RESPONSE:** COMPLIANT

**2.4.6.2** Records of all product release shall be maintained.

**RESPONSE:** COMPLIANT

## **2.5.1 Validation and Effectiveness (Mandatory)**

Elements of the SQF standard and other policies are validated annually, maintained on a spreadsheet. These include programs for allergen control, business continuity, foreign material control, GDPs, inbound shipments, maintenance, management structure, non-conforming product, outbound inspections, pest management, sanitation, supplier approval, training, waste control, food fraud, value added process and food quality management. These were validated by the QA Manager or SQF Practitioner on 2022-05-05 or 2021-11-05.

**2.5.1.1** The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented, implemented, and effective. The methods applied shall ensure that: i. Good Storage and Distribution Practices are confirmed to ensure they achieve the required result; 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 controls are still effective. Records of all validation activities shall be maintained.

**RESPONSE:** COMPLIANT

## **2.5.2 Verification Activities (Mandatory)**

A schedule of verification activities allergen control, business continuity, foreign material control, GDPs, inbound shipments, maintenance, management structure, non-conforming product, outbound inspections, pest management, sanitation, supplier approval, training, waste control, food fraud, value added process and food quality management is list for the current year, with instructions for each on how they are to be verified, including review of records, inspection and observations.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **2.5.3 Corrective and Preventative Action (Mandatory)**

The 'Corrective and Preventive Action Program' (CAPA) ver11 defines the method and occasion for documenting corrective actions related to food safety or quality, including audit findings, customer complaints, equipment issues, internal issues, recurrences of issues, processes or supplier issues. Any employee is authorized to initiate a CAPA. A register of CAPAs was presented. It includes the initiator name, date, issue, corrective action & date, root cause and status. As an example, a CAPA report dated 2021-05-26 regarding a rejected load due to shifting included a description, "problem containment", root cause analysis and permanent preventive action plan.

**2.5.3.1** The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including 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, non-conformances raised at internal or external audits and inspections, non-conforming product and equipment, or withdrawals and recalls, as appropriate.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **2.5.4 Internal Audits and Inspections (Mandatory)**

There is a formal 'Internal Audits Program' SOP that describes the process for performing internal audits. Comprehensive internal audits are conducted by the QA Manager and SQF Practitioner, according to a set schedule for each of the standard elements, to be completed in a year's time. Corrective actions may be documented through the CAPA program previously described; however, corrective actions are generally documented on the 'SQF Audit Schedule'. The audit was reviewed for the current year. Additionally, a monthly 'GDP Audit Form' is completed, which includes inspection against a list of known glass & brittle plastics, cleaning, operational practices, pest control and maintenance. Monthly inspections for SEP 2021, DEC 2021, MAR 2022 and APR 2022 were reviewed. The SQF Practitioner was certified in 'Principles of Internal Auditing' on 2015-03-13.

**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: Storage and Distribution are audited as per the SQF audit checklist or similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## 2.6.1 Product Identification (Mandatory)

License plate stickers are placed on all incoming pallets of materials. These are scannable bar codes that are traceable to all product information, including receipt date, vendor, purchase order, expiration date and other information. Products are rotated first expired first out (FEFO), except when directed by customers to select and ship specific lots of materials. Records are receipt and shipping records are maintained, demonstrated in the traceability exercise.

**2.6.1.1** The methods and responsibility for identifying products during all stages of storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Proper stock rotation; and ii. Accurate location of product.

**RESPONSE:** COMPLIANT

**2.6.1.2** Records of product receipt and use and product dispatch and destination shall be maintained.

**RESPONSE:** COMPLIANT

## 2.6.2 Product Trace (Mandatory)

All inventory is tracked using vendor lot numbers or coding information, tracked in the warehouse management system. Value added kit and variety pack items are traceable in the system. The allocation and documentation of lot numbers of components of the items was demonstrated during the inspection. The customer service team is responsible conducting trace exercises at least annually. A traceability exercise was conducted during the audit for a baby food item "Bone Broth Turmeric Chicken". 13,362 cases of the items were received against PO 12074 on 2022-03-18. A report of transactions against items was presented, showing all shipments of the item through e-commerce channels and including an adjustment of 5 cases of product for damages.

**2.6.2.1** The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Traceability of food products to the customer (one step forward); ii. Traceability of product to the supplier or manufacturing supplier with date of receipt (one step back); iii. Traceability is maintained where product is recouped; 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).

**RESPONSE:** COMPLIANT

## 2.6.3 Product Withdrawal and Recall (Mandatory)

The site has implemented a 'Recall' SOP. The program includes a list of entities with contact information, including site leaders, regulatory agencies, legal resource, certification body and SQFI, who are to be notified within 24 hours in the event of a product recall. The policy requires the site to conduct and document a mock recall exercise at least annually. An exercise was completed on 2022-01-27 for 2,560 pieces of a retail breakfast cereal item, initiated by one of the site's customer, achieving 100% recovery in 58 minutes. It is understood that the site hasn't had an actual recall in the past year.

**2.6.3.1** The responsibility and methods used to withdraw or recall products 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 employees, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

**RESPONSE:** COMPLIANT

**2.6.3.2** The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (one back), inhouse identification and isolation/quarantine, and where the product is shipped to (one forward).

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## 2.6.4 Crisis Management Planning

A 'Crisis Management' SOP 2021-08-03 addresses protocols to safeguard the food safety and quality of food products during a business crisis. The policy states that when such an emergency occurs, all food products will be considered on hold pending a release. There is a crisis management team comprised of the VP Warehousing, Director of Warehouse Operations, Director Business Systems, SQF Practitioner, Training Manager, QC Manager, Facilities Manager, Billing Manager, HR Manager and QA Manager. A crisis scenario test was conducted at the site on 2022-05-12, based on a fire event. As part of the exercise, 8 pallets of product and a forklift were placed on hold to test the procedure.

**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 event, 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 a response does 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 product prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## 2.7.1 Food Defense Plan (Mandatory)

A written 'Warehouse Product Defense' SOP, 2021-08-06, details the strategies employed at the site to deal with the risks posed by individuals that intentionally or deliberately adulterate food, packaging or other items to cause harm. The plan has provisions for training, suspicious activity, non-facility personnel, storage & use of chemicals, employee screening, physical security measures, inbound receiving, personal items, computer systems, recall strategy, annual reviews. There is an emergency contact list of key personnel, regulatory and emergency, also displayed in the break room area. A 'Food Defense Self-Assessment' was completed using an FDA tool, completed on 2022-02-17. All perimeter entrances to the site were observed secure and inaccessible during the inspections, except by electronic access by site personnel, or otherwise key locked. On 2022-04-12, a 'Food Defense Challenge' was documented in which inbound trailer seal checks by warehouse personnel was verified.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## 2.7.2 Food Fraud (Mandatory)

There is a 'Food Fraud' SOP 2021-08-02. A food fraud vulnerability assessment was conducted on 2022-01-11, based on risk of likelihood and severity. The assessment evaluated potential for mislabeling, dilution, concealment, omission, counterfeiting, unapproved enhancements and diversion. The program includes control measures and/or explanations for each of the categories.

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

**RESPONSE: COMPLIANT**

**2.7.2.2** A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled.

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

**2.7.2.4** Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.

**RESPONSE: COMPLIANT**

## 2.8.1 Allergen Management (Mandatory)

There is a formal 'Allergen Control Plan' implemented for the site. The program includes information regarding allergens and the various types, listing the major allergens and common products that contain them. The procedure has instructions for proper storage segregation, labeling requirements. Spill cleanup procedures are included in the plan. An 'Allergen Registry' is maintained identifying the finished products containing allergens and materials and accounts with which they are associated, reviewed on 2022-05-28. Materials are recouped only if they are intact with no signs of opening or tampering.

**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 controls shall be based on a risk assessment and include the identification, labeling, and handling of allergen-containing product, including product recoup, to prevent inadvertent cross contact.

**RESPONSE: COMPLIANT**

**2.8.1.2** Recouped product containing food allergens (refer to 2.4.5) shall be repackaged under conditions that ensure product safety and integrity is maintained. Recouped product containing allergens shall be clearly identified and traceable.

**RESPONSE: COMPLIANT**

**2.8.1.3** Sites that do not handle allergenic materials or store allergenic products shall document, implement, and maintain an allergen management program that addresses, at a minimum, the mitigation of introduced or unintended allergens from suppliers, contract manufacturers, site personnel, and/or visitor activities.

**RESPONSE: COMPLIANT**

## 2.9.1 Training Requirements

There is a 'Training Program' implemented by the site. The SOP defines the requirements and procedure for training. The policy identifies "senior leadership", Human Resources and department managers as being responsible for ensuring prescribed training is carried out, including for new hires. Training is conducted using an 'Alchemy' training application and is scheduled monthly according to various topics to be completed throughout the year. Food safety related training is scheduled January through May each year. Work safety training is largely completed the 2nd part of the year.

**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 product legality and safety shall be defined and documented (refer to 2.1.1.6).

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

## 2.9.2 Training Program (Mandatory)

Training topics for warehouse employees include allergen awareness, corrective actions (CAPA), product defense, foreign material control, GDPs, hygiene, storage practices, pest control, sanitation and job specific receiving & shipping, food safety for selectors and food safety standard. Records are maintained the Alchemy database, demonstrated during the audit. Records for selected employees were provided, including for a Warehouse employee and Lead person engaged during the inspection. Records indicate that both have completed assigned food safety training for the year 2022. Additionally, the SQF Practitioner has completed both the standard food safety training topics and supervisory topics for the year. Temporary employees are given orientation prior to beginning their work and placed with a Lead person for on the job training. An example training record for a temporary warehouse person engaged in the inspection was provided, dated 2022-04-13. Training competence is measured by administration of quizzes through the Alchemy system for each of the assigned topics.

**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 for personnel carrying out tasks associated with: i. Developing and maintaining food safety plans to meet regulatory requirements and the SQF Code; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in handling of food products and food contact surfaces; iv. Good Storage and Distribution Practices and work instructions for all staff engaged in food handling, food storage and transport, and associated equipment; v. Allergen management, food defense, and food fraud for all relevant staff; and vi. Tasks identified as critical to meeting effective implementation and maintenance of the SQF Code. The training program shall include provision for identifying and implementing the refresher training needs of the organization.

**RESPONSE:** COMPLIANT

**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 languages understood by staff.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## 12.1.1 Premises Location and Approval

The facility is located in a commercial area of West Chester Township. No obvious food safety risks or practices were observed during the inspection. The site is registered with FDA as a food facility through 2022-12-31.

**12.1.1.1** 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

## 12.1.2 Building Materials

Floors in the facility are sealed 7" concrete. Walls are tilt concrete. The roof is conventional steel overlaid with rubber membrane with stone ballast, replaced in 2005. Drains are located in restrooms and none are in the warehouse areas. Doors are well constructed of materials to facilitate cleaning. Excepting some cobwebs noted in a subsequent element, ceilings in the production areas were clean, not a potential for contamination. There are no cross-over walkways or stairs that present a potential for contamination of exposed products. Floors had no standing water. NA: The warehousing area does not have drop ceilings. NA: Exposed product isn't recouped.

**12.1.2.1** Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.

**RESPONSE:** COMPLIANT

**12.1.2.2** Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.

**RESPONSE:** COMPLIANT

**12.1.2.3** Waste trap system shall be located away from any food handling or storage area or entrance to the premises.

**RESPONSE:** COMPLIANT

**12.1.2.4** 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 12.2.5). 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

**12.1.2.5** Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.

**RESPONSE:** COMPLIANT

**12.1.2.6** Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: The warehousing area does not have drop ceilings.

**12.1.2.7** In warehouses where food products are recouped or exposed, the product contact surfaces shall be constructed of materials that will not contribute a food safety risk

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: Exposed product isn't recouped.

### **12.1.3 Lightings and Light Fittings**

The facility is well lit with LED fixtures, appropriate for the handling and storage being done. Fixtures are properly shielded or otherwise use shatter resistant bulbs, including dock lights.

**12.1.3.1** Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

**RESPONSE:** COMPLIANT

**12.1.3.2** Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

**RESPONSE:** COMPLIANT

**12.1.3.3** Light fittings in other areas of the warehouse where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

**RESPONSE:** COMPLIANT

### **12.1.4 Dust, Insect, and Pest Proofing**

Dock doors and other perimeter entrances were properly sealed against potential pest intrusion, kept closed when no in use. Personnel doors are self-closing. Ventilation is also properly protected from pest entry, including dock door screen, which was not in used during the inspection. The docks are equipped with dock pads and shrouds to facilitate sanitary operations. Insect lights installed at the site are away from foods and don't pose a potential for contamination. Rodenticides or other pest chemicals are not stored in the facility.

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

**RESPONSE:** COMPLIANT

**12.1.4.2** Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.

**RESPONSE:** COMPLIANT

### **12.1.5 Ventilation**

The building is well ventilated, with no observed odors or condensation. There are no air handling systems in the large warehouse area. Roof mounted exhaust fans are properly screened and were observed clean.



12.1.5.1 Adequate ventilation shall be provided in enclosed storage and food handling areas.

**RESPONSE:** COMPLIANT

12.1.5.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.

**RESPONSE:** COMPLIANT

## 12.1.6 Equipment and Utensils

Purchase orders for equipment, utensil and cleaning chemicals purchases are approved by department heads. Only approved suppliers, referenced prior in the audit, can be written a purchase order. MHE and cleaning utensils were properly designed, clean and did not pose a potential for contamination of products or materials. NA: The site doesn't handle exposed product and doesn't recoup any items that have been damaged or otherwise exposed.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

12.1.6.3 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

12.1.6.4 All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

**RESPONSE:** COMPLIANT

12.1.6.5 Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.

**RESPONSE:** COMPLIANT

12.1.6.6 In addition to the above, locations handling exposed products and recouping products on-site shall have: i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5; ii. Clearly identified equipment and utensils that are used for inedible material; and iii. Clearly identified waste and overflow handling equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: The site doesn't handle exposed product and doesn't recoup any items that have been damaged or otherwise exposed.

## 12.1.7 Grounds and Roadways

Grounds are paved or otherwise well-manicured, including a pea gravel perimeter around the back of the building to prevent vegetation. There were no obvious food safety risks or practices observed. Surrounding businesses were maintained and in good condition.

12.1.7.1 The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste or accumulated debris so as not to attract pests and vermin.

**RESPONSE:** COMPLIANT

12.1.7.2 Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

**RESPONSE:** COMPLIANT

12.1.7.3 Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.

**RESPONSE:** COMPLIANT

### 12.2.1 Repairs and Maintenance

A formal 'Maintenance Program including Documentation' SOP 2022-05-11 is implemented for the site. The program specifies the responsibility of the Director of Warehouse Operations to implement and ensure the program is in place. MHE maintenance is done by an outside company. There is a provision in the SOP to ensure that there is no increase in risk to food safety, quality or defense as a result of maintenance work. Some recent preventive maintenance invoices for a floor scrubber and two forklifts dated 2022-04-19 and 2022-03-31 were presented during the audit. Repairs in the building are generally handled by site personnel, managed through work orders. There were no temporary repairs observed during the inspection of the facility. NA: Exposed product is not handled at the site requiring food grade lubricants.

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

**RESPONSE:** COMPLIANT

**12.2.1.2** The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety. Routine maintenance of plant and equipment in any food handling or storage area shall be performed according to a maintenance control schedule and recorded.

**RESPONSE:** COMPLIANT

**12.2.1.3** Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.

**RESPONSE:** COMPLIANT

**12.2.1.4** Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.

**RESPONSE:** COMPLIANT

**12.2.1.5** The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance 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

**12.2.1.6** Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.

**RESPONSE:** COMPLIANT

**12.2.1.7** Equipment located over exposed product shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: Exposed product is not handled at the site requiring food grade lubricants.

**12.2.1.8** Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.

**RESPONSE:** COMPLIANT

### 12.2.2 Maintenance Staff and Contractors

Air conditioning, MHE, door repair and some other maintenance is done by 3rd party companies. These personnel are required to adhere to food safety and hygiene requirements of the site. There is a 'Good Contractor Practices' policy that must be reviewed and signed by outside contractors that includes food safety, hygiene and work safety requirements. These are kept on file and were presented during the audit, including some examples that include the air conditioning company on 2021-08-15 and MHE maintenance company on 2022-05-31.

**12.2.2.1** Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).

**RESPONSE:** COMPLIANT

**12.2.2.2** All maintenance staff and 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. Records of training shall be documented and retrievable.

**RESPONSE:** COMPLIANT

**12.2.2.3** 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 that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

**RESPONSE:** COMPLIANT

### 12.2.3 Calibration

There are two scales used by the site for pallet weights and drop shipment box weights. These are calibrated by an outside company on an annual basis. Records indicated that calibrations were completed on 2022-01-27. Being an ambient storage facility that receives, stores and ships customer materials, there are no thermometers used.

**12.2.3.1** 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 and secured as appropriate.

**RESPONSE:** COMPLIANT

**12.2.3.2** 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. A list of measuring, testing, and inspection equipment requiring calibration shall be maintained.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.2.3.4** Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, testing, and inspection equipment be found to be out of calibration state.

**RESPONSE:** COMPLIANT

**12.2.3.5** A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

**RESPONSE:** COMPLIANT

### 12.2.4 Pest Prevention

There is a 'Taylor Logistics Pest Control Program' 2020-05-29. Pest control is managed by a 3rd party contractor, 'Terminix', who has provided a 'Commercial Pest Control Agreement' updated on 2021-10-01, defining the frequency of service, equipment placement and target pests. There is current business license issued by the Ohio Department of Agriculture, expiring on 2022-09-30 and a certificate of liability insurance expiring on 2023-01-01. Commercial applicator licenses are maintained on file. The SQF Practitioner is also licensed by the state, expiring on 2021-09-30. Awareness training is provided for employees in routine training through the computer assisted system. A site map showing the placement of pest control devices was verified on 2022-01-07. There are 66 internal rodent traps, 9 insect light traps, 8 pheromone traps and 34 exterior rodent bait stations. A pesticide usage log is used to document the application of materials, including area treated, material used, lot number, method used, amount and rate of use. SDSs and specimen labels are kept on file and through a web portal, demonstrated for 'Contrac All-Weather Blox' used for bait stations. Pesticides are not stored on site. No animals are allowed into storage areas of the facility. Semi-monthly reports from 2022-01-07 through 2022-05-20 were reviewed.

**12.2.4.1** 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 on a site map the identification, location, number, and type of applied pest control/ monitoring devices; vii. List the chemicals used. They 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 required 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 identify trends.

**RESPONSE:** COMPLIANT

**12.2.4.2** 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 12.2.4.1), 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

**12.2.4.3** Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken 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

**12.2.4.4** 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 investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

**RESPONSE:** COMPLIANT

**12.2.4.5** Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: Pesticides are not stored on site.

**12.2.4.6** No animals shall be permitted on-site in food handling or storage areas.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No animals are permitted on site.

## **12.2.5 Cleaning and Sanitation**

MINOR: There were a number of areas in the warehouse with accumulated cobwebs, including around the windows on the south side windows and along the perimeter around upright posts and on high, difficult to reach walls. The site has a written 'Sanitation Program', defining methods to provide a "SQF environment for the storage of our customers' products." Sanitation is the responsibility of the SQF Practitioner. There is a 'Master Cleaning Schedule' for other-than-daily tasks, scheduled for monthly, quarterly and annual completion. These include interior and exterior cleaning tasks. The schedule is up to date and initialed as verified by the SQF Practitioner. Additionally, a 'Daily Cleaning Schedule' is used to assign and document trash, floor and janitorial tasks, also initialed as verified and up to date. An 'MHE Cleanliness Check' form is completed monthly to inspect forklift equipment for cleanliness. Other than the janitorial tasks, all cleaning is done by site personnel. Cleaning chemicals are segregated from storage areas. A list of approved cleaning chemicals and inventory was presented. Cleaning utensils were properly stored on designated shadow boards. Excepting the minor finding noted above, the facility is maintained extremely clean and tidy.

**12.2.5.1** The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities 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 cleaning; v. Validation of cleaning procedures; 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:** MINOR

**EVIDENCE:** MINOR: There were a number of areas in the warehouse with accumulated cobwebs, including around the windows on the south side windows and along the perimeter around upright posts and on high, difficult to reach walls.

**ROOT CAUSE:** Inconsistencies in warehouse cleaning.

**CORRECTIVE ACTION:** Windows sweep weekly added to Master Cleaning Schedule doc. # 11.05 Building concrete panels resealed in 05 and 06/2022. Resealed dock door # 19 thru 26 by Equipment Depot. Check into anti web spray.

**VERIFICATION OF CLOSEOUT:** Review of provided evidence

**COMPLETION DATE:** 06/17/2022 **CLOSEOUT DATE:** 06/22/2022

**12.2.5.2** Detergents and sanitizers shall be suitable for use in a food and storage and handling 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 chemicals purchased and used is maintained; iii. Detergents and sanitizers are stored as outlined in element 12.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.2.5.4** Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.

**RESPONSE:** COMPLIANT

**12.2.5.5** 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, product handling equipment, and storage areas as well as the tools themselves.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.2.5.7** Records of cleaning and sanitation activities, verification, and inspections shall be maintained.

**RESPONSE:** COMPLIANT

**12.2.5.8** 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

### **12.3.1 Personnel Welfare**

There were no employees observed with any obvious illness or exposed wounds during the inspection. Blood spill cleaning kits are kept at the site. Bandages are provide in first aid stations for minor wounds. The operation doesn't handle exposed food.

**12.3.1.1** Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.3.1.3** Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products, recoup, or repack processes.

**RESPONSE:** COMPLIANT

### **12.3.2 Handwashing**

Hand washing instructions are defined in the site's hygiene standards. Wash sinks are installed in employee restrooms and at the entrance to the warehouse outside the breakroom. Employees were observed washing their hands after using the restroom and when entering the warehouse. Sinks are stainless or porcelain, supplied with warm running water, liquid soap and single use paper towels. The restrooms are posted with hand wash signs to remind employees. Trash receptables are placed near hand wash sinks.

**12.3.2.1** All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling, storage, and processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After sneezing or coughing.

**RESPONSE:** COMPLIANT

**12.3.2.2** Handwash stations shall be available and accessible as required.

**RESPONSE:** COMPLIANT

**12.3.2.3** Handwash 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; iii. Paper towels; and iv. A means of containing used paper towels. An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

**RESPONSE:** COMPLIANT

**12.3.2.4** Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **12.3.3 Clothing and Personal Effects**

Clothing worn by employees was observed clean and in acceptable condition. There is not a requirement for any protective clothing. The site allows employees to wear jewelry in the facility. A risk assessment was completed on 2021-07-29 determining there is not a food safety risk by jewelry as no exposed product is handled.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.3.3.3** Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.

**RESPONSE:** COMPLIANT

**12.3.3.4** Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does 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

### **12.3.4 Visitors**

GDPs and hygiene rules at the site are in place and required to be followed by visitors. Visitors aren't allowed to enter the site if exhibiting signs of illness. Upon arrival, visitors must enter the front lobby door and sign in on a visitor log. Additionally, they are required to review and sign acknowledgement of site GDP and safety rules. Over the road delivery and pickup drivers are required to enter the building at a designated entrance in the dock area, which is fenced and electronically secured. Drivers are required to enter their information on a 'Driver Sign In Sheet', observed during the inspection, including their name, carrier and trailer number. Drivers may enter the facility accompanied to unload their trucks on some occasions.

**12.3.4.1** All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).

**RESPONSE:** COMPLIANT

**12.3.4.2** All visitors, including management staff, shall wear suitable clothing and footwear when entering any food storage and handling area.

**RESPONSE:** COMPLIANT

**12.3.4.3** Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).

**RESPONSE:** COMPLIANT

**12.3.4.4** 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

**12.3.4.5** All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all times in food handling and storage areas.

**RESPONSE:** COMPLIANT

**12.3.4.6** The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.

**RESPONSE:** COMPLIANT

### **12.3.5 Staff Amenities (change rooms, toilets, break rooms)**

Breakroom facilities are in a single designated area of the site. The breakroom is of sufficient space, well lit and clean. Daily cleaning tasks are included in the cleaning schedule. There was no evidence of sanitary drainage cross-connections. Handwashing facilities are provided in the restrooms and outside the break room. An outdoor employee area with tables was observed sufficiently clean and tidy. Handwash signs are posted in English.

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

**RESPONSE:** COMPLIANT

**12.3.5.2** Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food storage areas.

**RESPONSE:** COMPLIANT

**12.3.5.3** Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any food handling operations; ii. Accessed from the warehouse or food handling 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; and v. Kept clean and tidy.

**RESPONSE:** COMPLIANT

**12.3.5.4** 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. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

**RESPONSE:** COMPLIANT

**12.3.5.5** Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

**RESPONSE:** COMPLIANT

**12.3.5.6** Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.3.5.8** Signage in languages understood by staff advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in break rooms and break room exits.

**RESPONSE:** COMPLIANT

### 12.4.1 Personnel Processing Practices

All personnel are required to wash their hands prior to entering the warehouse area. Note that exposed foods are not handled in the warehousing or value added kitting process. Employees enter the facility through a designated door, both into the building and into the warehouse. Materials are stored off of the floor on pallets except for certain bulk containers where there is not a potential for product contamination. Waste was observed properly gathered and contained in lined trash containers. There is a water station located near the employee restrooms.

**12.4.1.1** All personnel shall comply with the following practices: i. Personnel entry to food handling areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer; iii. The wearing of false fingernails or fingernail polish is not permitted when handling exposed food; iv. Materials and products shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate; vi. Staff shall not eat or taste any product in the food storage or handling area; vii. Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and viii. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only. 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

**12.4.1.2** All personnel engaged in storage, transport, and handling of packaged products and materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.

**RESPONSE:** COMPLIANT

### 12.5.1 Water Supply

Water is provided by the Butler County municipality and is potable. There is an adequate supply of hot and cold water. There were no non-potable water lines in the building. An annual backflow prevention device test was documented on 2021-09-28. There is a written contingency plan for "water outage" that includes provisions to use bottled water, temporary toilets and hand washing stations.

**12.5.1.1** Adequate supplies of water drawn from a known clean source shall be provided for use during holding, storage and cleaning of the premises and equipment.

**RESPONSE:** COMPLIANT

**12.5.1.2** 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

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

**RESPONSE:** COMPLIANT

**12.5.1.4** 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

**12.5.1.5** The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

**RESPONSE:** COMPLIANT

**12.5.1.6** Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: Water isn't stored on site.

### 12.5.2 Water and Ice Quality

NA: No water or ice comes into contact with product as no product is opened or exposed in the facility.



**12.5.2.1** Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No water or ice comes into contact with product as no product is opened or exposed in the facility.

**12.5.2.2** Water and ice shall be analyzed using reference standards and methods.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No water or ice comes into contact with product as no product is opened or exposed in the facility.

**12.5.2.3** Ice rooms and receptacles shall be constructed of materials as outlined in elements 12.1.2 and designed to minimize contamination of the ice during storage and distribution.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No water or ice comes into contact with product as no product is opened or exposed in the facility.

### **12.5.3 Air and Other Gases**

NA: No compressed air or gases come into contact with food.

**12.5.3.1** Compressed air or other gases (e.g. nitrogen, carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No compressed air or gases come into contact with food.

**12.5.3.2** Compressed air systems and systems used to store or dispense other gases used in food storage and distribution process shall be maintained and regularly monitored for quality and applicable food safety hazards.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: No compressed air or gases come into contact with food.

### **12.6.1 Receipt, Storage and Handling of Goods**

There is a formal 'Storage Practices' SOP, describing the procedures for all product stored in the warehouse including food and other items. All storage at the site is ambient and dry, including an air conditioned room used to maintain quality for some heat sensitive products. Stock is rotated by first expired first out method, using captured vendor code information, except in cases when customer request shipment out of rotation. The recoup process for returned goods was demonstrated, ensuring that out of code items not be used. There were no expired products observed. Goods were not stored in overflow areas. Almost all stock is stored in floor locations without racking, except for a small section just installed in the past week. NA: The site doesn't receive frozen or chilled products.

**12.6.1.1** The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging, equipment, and chemicals.

**RESPONSE:** COMPLIANT

**12.6.1.2** Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: The site doesn't receive frozen or chilled products.

**12.6.1.3** The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

**RESPONSE:** COMPLIANT

**12.6.1.4** Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.

**RESPONSE:** COMPLIANT

**12.6.1.5** Where goods are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods, or contamination, or adverse effects on food safety.

**RESPONSE:** COMPLIANT

**12.6.1.6** Records shall be available to verify alternate or temporary control measures for storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.

**RESPONSE:** COMPLIANT

**12.6.1.7** Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.

**RESPONSE:** COMPLIANT

## **12.6.2 Cold Storage, Freezing and Chilling of Foods**

NA: All products are shelf stable and do not require refrigeration.

**12.6.2.1** The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and shall be easily accessible for inspection and cleaning.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: All products are shelf stable and do not require refrigeration.

**12.6.2.2** Sufficient refrigeration capacity shall be available to store chilled or frozen food at the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: All products are shelf stable and do not require refrigeration.

**12.6.2.3** Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: All products are shelf stable and do not require refrigeration.

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

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: All products are shelf stable and do not require refrigeration.

**12.6.2.5** Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: All products are shelf stable and do not require refrigeration.

## **12.6.3 Storage of Dry Goods**

All storage areas are dry and ambient. There are no wet areas in the storage facility.

**12.6.3.1** Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from becoming a harborage for pests or vermin.

**RESPONSE:** COMPLIANT

## 12.6.4 Storage of Hazardous Chemicals and Toxic Substances Used On-site

Cleaning chemicals are segregated in designated areas away from storage. Pesticides are not stored on site, managed by an outside pest control company by a licensed pest control operator. Cleaning chemicals are approved for their use and stored in labeled containers. A containment and cleanup kit is kept by the site for potential battery acid spills. Employees are trained annually to clean acid spills as part the HAZCOM training module. Empty chemical container are not reused and are properly disposed of.

**12.6.4.1** Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces; iii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; iv. Supplemented with a current Safety Data Sheet (SDS) made available to all staff; v. Controlled to track usage and ensure return to the appropriate storage areas after use; vi. Be compliant with national and local legislation; and vii. Used so that there is no cross-contamination between chemicals.

**RESPONSE:** COMPLIANT

**12.6.4.2** Hazardous chemicals and toxic substances shall be stored: i. In an area with appropriate signage; ii. Accessible only by personnel trained in the storage and use of chemicals; iii. Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment; iv. In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and v. Stored so that there is no cross-contamination between chemicals.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.6.4.4** The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not reused; ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

**RESPONSE:** COMPLIANT

**12.6.4.5** 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 spillage kits and cleaning equipment.

**RESPONSE:** COMPLIANT

## 12.6.5 Loading, Transport, and Staging Practices

The site has developed written procedures for receiving and shipping. Specifically there is an 'Inbound Inspection' SOP, requiring that trailers, pallets and incoming product be checked for damage, physical, chemical and biological hazards. A written 'Outbound Trailer Inspection' SOP is a "positive release system designed to identify non-conforming goods and services before they leave the facility. 'Inbound/Outbound Inspection Form' reports were reviewed for inbound loads for the following dates: 2021-09-02, 2021-12-08, 2022-03-11, 2022-03-16, 2022-05-23, 2022-05-24. Outbound inspections are documented on 'Product Release Form' reports, noting the trailer number, seal number and trailer condition. Product Release Forms from 2021-09-02, 2021-09-03, 2021-12-08, 2021-12-09, 2022-03-15, 2022-03-16, 2022-05-23, 2022-05-24. NA: The site doesn't handle refrigerated or frozen items.

**12.6.5.1** The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.

**RESPONSE:** COMPLIANT

**12.6.5.2** Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at the required environmental condition and temperature.

**RESPONSE:** COMPLIANT

**12.6.5.3** Vehicles (e.g. trucks/vans/containers) used for transporting food 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

**12.6.5.4** Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

**RESPONSE:** COMPLIANT

**12.6.5.5** Where applicable, food transport vehicles' refrigeration units shall maintain the food at the required temperatures and the units' temperature settings shall be set, checked, and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate. The refrigeration units shall be operational at all times and checks shall be completed of the units' operation, the door seals, and the storage temperature at regular intervals during transit.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: The site doesn't handle refrigerated or frozen items.

**12.6.5.6** Upon arrival and prior to opening the doors, the food transport vehicles' refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** NA: The site doesn't handle refrigerated or frozen items.

## **12.7.1 Process Flow**

The site handles strictly unexposed products and non-food materials and the process doesn't contribute to potential contamination of the product.

**12.7.1.1** The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

**RESPONSE:** COMPLIANT

## **12.7.2 Control of Foreign Matter Contamination**

The 'Glass & Foreign Materials' SOP defines the prohibition of certain materials such as glass, storage of pallets, knife use, potential for roof or trailer leaks, pest evidence, dirt & debris. Wood pallets were used in the site and were in good condition. There were no loose objects on products. Glass inspections are conducted on monthly GDP inspections against known materials in the facility. Records for the months of SEP 2021, DEC 2021, MAR 2022 and MAY 2022 were reviewed.

**12.7.2.1** The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.

**RESPONSE:** COMPLIANT

**12.7.2.2** Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not been detached or become damaged or deteriorated.

**RESPONSE:** COMPLIANT

**12.7.2.3** Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers, or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones.

**RESPONSE:** COMPLIANT

**12.7.2.4** Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.

**RESPONSE:** COMPLIANT

**12.7.2.5** Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.

**RESPONSE:** COMPLIANT

**12.7.2.6** Regular inspections of storage and handling 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

**12.7.2.7** Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

**RESPONSE:** COMPLIANT

**12.7.2.8** Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **12.7.3 Managing Foreign Matter Contamination Incidents**

Glass and foreign material clean up instructions are documented in the 'Broken Glass Safe Work Procedure'. There is a 'Foreign Material Incident' report to use in the event of breakages. An example from 2021-06-01 was presented for a glass bottle that was dropped and broken while re-kitting, documenting the cleaning steps and verification that product wasn't affected.

**12.7.3.1** In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked, or disposed of.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **12.8.1 Waste Disposal**

A 'Waste Control' SOP describes the procedures to use throughout the facility. Waste disposal is inspected daily by the SQF Practitioner. There is no waste designated for animal feed. Trash is collected in lined receptacles placed throughout the facility and stored in a dumpster located next to a dock door, removed three times each week. Recyclable cardboard is collected in an open top container picked up weekly. Waste water is not pre-treated. There are provisions for destruction of customer trademarked materials. As an example 'Certificate of Disposal/Destruction' was completed for a number of items destroyed through the waste management company, dated 2022-05-26.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**12.8.1.3** Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.

**RESPONSE:** COMPLIANT

**12.8.1.4** Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

**RESPONSE:** COMPLIANT

**12.8.1.5** Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

**RESPONSE:** COMPLIANT

**12.8.1.6** Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).

**RESPONSE:** COMPLIANT

**12.8.1.7** A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).

**RESPONSE:** COMPLIANT