



AIB International Consolidated Standards for Inspection

Food Safety

Facility Name	: U.S. Gypsum Company
Account Number	: 6183
Facility Address	: Highway 51A Southard, Oklahoma 73770 United States
Dates(s) of Inspection	: 14-OCT-11
Announcement Type	: Announced
Inspection Type	: Scored
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CUSTOMER DETAILS

Organization Name U.S. Gypsum Company
Account Number 6183
Products Produced Calcium Sulfate

PARTICIPANT NAMES

Name	Role	Inspection	Closing Meeting
Kelly Bedwell	Quality Foreman	Yes	Yes
Kyle Hightower	Packing Manager	Yes	Yes
Marsha Mackie	Quality Coordinator	Yes	Yes
Mike Cloud	Mill Manager	Yes	Yes
Theron Mitchel	TA Supervisor	Yes	Yes
Wade Williams	Production Foreman	Yes	Yes
Jose Ortega	Auditor	Yes	Yes

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CATEGORY SCORES

Announcement Type Announced
Inspection Type Scored
Variation From Expected Scope Only food grade areas were inspected along with the common areas.

Category	Minor Issues Noted (MI)	Improvement Needed	Serious	Unsatisfactory	Score
Operational Methods and Personnel Practices	2	0	0	0	180
Maintenance for Food Safety	1	1	0	0	175
Cleaning Practices	1	0	0	0	180
Integrated Pest Management	0	1	0	0	175
Adequacy of Prerequisite and Food Safety Programs	4	0	0	0	180
Total Score					890

OVERALL RESULTS

Rating Recognition of Accomplishment

OBSERVATIONS BY RISK WITHIN CATEGORY

#	Rating	Standard	Standard #	Requirement #	Location
1	Minor Issues Noted (MI)	Pallets	1.5	1.5.2.2	Raw Material Storage
	Finding:	Slipsheets were not consistently used between pallets to protect materials from damage or contamination. Slipsheets were missing from double stacked pallets of products in bags in the warehouse.			
	Recommendation:	It was recommended that the double stacked pallets of bagged products be protected with a slipsheet to ensure product integrity.			
2	Minor Issues Noted (MI)	Health Conditions	1.33	1.33.2.1	Facility Overview
	Finding:	Records indicated that bandages were not regularly tested in the metal detector.			
	Recommendation:	It was recommended that the bandages be tested to ensure proper compliance of the bandage manufacturer.			
3	Minor Issues Noted (MI)	Overhead Structures	2.6	2.6.1.1	Production
	Finding:	Fixtures, ducts and pipes were not consistently installed and maintained to prevent contamination from loose material. Fraying insulation was noted by the walk way to the food grade area of the processing. No insulation was noted on the walkway.			
	Recommendation:	It was recommended that the insulation be removed to ensure no pest harborage occurs in this area.			
4	Minor Issues Noted (MI)	Overhead Structures	2.6	2.6.1.2	Production
	Finding:	Evidence of flaking paint in the overheads or from production equipment was observed outside of the product zone. Flaking paint was noted on the rock bin and framework for the rock bin. A flake of paint was noted on the wall structure in this area.			
	Recommendation:	It was recommended that these areas be scraped to ensure no further degradation occurs.			
5	Improvement Needed (IN)	Temporary Repair Materials	2.15	2.15.1.1	Facility Overview
	Finding:	Some paper towels were used to seal a leak on the finish product bin silo at the bottom slide gate. The paper towels were stuffed between the framework of the transition chute.			
	Recommendation:	It was recommended that the holding bin be repaired properly to ensure no pests develop in the paper towels.			
6	Minor Issues Noted (MI)	Periodic (Deep) Cleaning	3.5	3.5.1.2	Production
	Finding:	Deep cleaning of equipment was not consistent with the frequencies defined on the Master Cleaning Schedule. Heavy buildup was noted on the supports and in the corners on the floors. This product is not conducive to insects.			
	Recommendation:	It was recommended that these areas be cleaned so no pests harborages occur.			
7	Improvement Needed (IN)	Facility Assessment	4.2	4.2.1.1	Facility Overview
	Finding:	No facility assessment had been conducted or documented.			
	Recommendation:	It was recommended that an assessment occur to ensure the PCO competency and compliance with the standard.			
8	Minor Issues Noted (MI)	Training and Education	5.5	5.5.1.1	Facility Overview

Finding: Training did not appear to be fully effective based on observations and findings noted at this facility. Slipsheets were missing from double stacked pallets in the warehouse.
 Recommendation: It was recommended that a review of the slipsheet policy occur to ensure complete understanding.

9 Minor Issues Noted (MI) Self-Inspections 5.6 5.6.1.3 Facility Overview
 Finding: Inspection results did not consistently include observations, Corrective Actions, specific assignments, and actual accomplishments. The last self-inspection took place on September 19, 2011. Twenty-five issues were documented on the last self-inspection. Several holes in the walls were noted on the document.
 Recommendation: It was recommended the continued intensity occur on the self-inspections to ensure continued food safe environment.

10 Minor Issues Noted (MI) Cleaning Program 5.13 5.13.1.2 Facility Overview
 Finding: The formal documented Cleaning Program that included a Master Cleaning Schedule (MCS) for periodic cleaning assignments, as well as a daily housekeeping schedule, was not fully developed and implemented in this facility. The framework is scheduled to be cleaned once a year. Heavy build-up was noted on the framework in the processing areas.
 Recommendation: It was recommended that increased frequency occur in these areas to ensure proper cleaning occurs.

11 Minor Issues Noted (MI) Preventive Maintenance Program 5.14 5.14.1.1 Facility Overview
 Finding: A partially developed Preventive Maintenance Program and work order system was implemented for this facility. The last "PM" for the finished product bin silo took place on October 6, 2011. The "PM" did not specifically address the slide gate area.
 Recommendation: It was recommended that the "PM" be modified to include areas of potential break downs to ensure proper functioning and repairs occur.

FACILITY SPECIFIC INFORMATION

Ref#	Question	Comments
1	Does the facility use bulk dry materials?	Yes
1a	If so, state the materials received, if they are sifted, screen size in the sifter, and frequency of screen checks and tailings checks.	Gypsum Rock is ground into calcium sulfate and no sifting occurs at receiving.
2	Does the facility use Bulk Liquid materials?	No
2a	If so, comment on materials received, are strainers provided and where, frequency of strainer inspections, and documentation.	N/A
3	Does the site have temperature controlled areas such as coolers or freezers?	No
3a	If so state temperatures observed, method of monitoring such as manual or continuous, and if an alarm system is present.	N/A
4	Are foreign material control devices used?	Yes
4a	If so, list devices used and if they are present on all lines. Comment on device testing observed during the inspection.	Metal detectors are used at this facility and are present on the only food grade line and testing was observed and operated properly.
5	Were IPM services provided by a contractor?	Yes
5a	If so, provide name of service provider, comment on if business and PCO licenses were current. If licenses were not required, was training provided and was GMP training provided.	The service provider is Orkin and the business license expires on December 31, 2011. The PCO license expires on December 31, 2012. The insurance expires on January 1, 2012. The last GMP training took place on September 9, 2011.
5b	If pesticides were used comment on availability of MSDS and sample labels and list pesticides used in past 12 months.	The rodenticide used at this facility is Contrace Blox EPA#12455-79 and the pesticides used are Talstar EPA#279-3206 and Cykick CS EPA#499-304 and the labels and MSDS were available.
6	Who has the assigned responsibility (job title) for food safety at the facility?	Food safety is assigned to Quality Foreman.
7	Does the site have a documented Microbiological control program in place?	No
7a	If so, comment if testing is for Sanitation, Finished Product and/or Environmental and the organisms tested for.	N/A
7b	Comment if the laboratory is In-house or if an outside lab used.	N/A

8	Has the site been inspected by a regulatory agency in the past year?	Yes
8a	If so, indicate the date and agency that conducted the inspection and if corrective actions were documented for any findings.	The Oklahoma State Department of Health visited on February 23, 2011. No issues were noted.
9	Is a HACCP program in place?	Yes
9a	If so, indicate if the plan has been validated and by who. Also indicate the date of the most recent reassessment.	The last reassessment took place October 3, 2011 and no validation occurred.
9b	Did the facility store or produce any products under regulatory HACCP guidelines? If so, list the products.	No

ALL OBSERVATIONS AND RECOMMENDATIONS

- **Unsatisfactory or Serious Items are designated in bold and italic.**
- **Improvement Needed items are designated in bold.**
- *Minor Issues are designated in Italics.*

1.0 Operational Methods and Personnel Practices

#	Rating	Standard	Standard #	Requirement #	Location
1	Comments Finding Finding Finding	Rejection of Shipments Damaged, infested or dirty transports or containers were rejected upon receipt. Documentation of rejection of damaged, infested and-or dirty materials was included as part of the program. Rejection documentation, including the reason for rejection, was in place and current.	1.1		Facility Overview
2	Comments Finding Finding Finding Finding Finding Finding Finding Finding Finding	Storage Practices Ingredient storage and removal was done in a way to prevent contamination. Receiving dates or other viable means of stock rotation were in use at the facility. Materials were stored off the floor. Perimeter clearance was provided for storage of materials. Adequate space for storage of materials was in place to allow access for cleaning, inspection and pest control monitoring activities. Materials stored outside were protected against deterioration and contamination. Receiving dates were provided to facilitate stock rotation. Adequate clearance between pallet rows was provided. Storage slots and traffic lanes were provided for floor level storage of materials. Racks were installed against the wall with sufficient clearance to allow access for cleaning, inspection and pest control monitoring activities.	1.2		Facility Overview
3	Comments Finding Finding Finding Finding	Storage Conditions Storage areas were clean, well ventilated, and dry. Materials and packaging were protected from contaminants. Partially used packaging materials were covered or protected prior to being returned to storage. Segregation of non-product related materials, chemicals, equipment and utensils was practiced at this facility. R&D materials, raw materials, and packaging were inspected for signs of infestation on a regular basis.	1.3		Facility Overview

	Finding	Special handling procedures were in place for packaging materials with a product safety risk.			
	Finding	Segregation of packaging materials from raw materials and finished products was observed			
4	Comments Finding	Raw Material Inventory Ingredients and packaging materials were rotated on a First-In, First-Out basis.	1.4		Facility Overview
5	Comments Finding Finding	Pallets Pallets were observed to be clean and in good repair. Pallets and other wooden surfaces were found to be properly dried after cleaning.	1.5		Facility Overview
6	<i>Minor Issues Noted (MI)</i> Finding <i>Recommendation</i>	<i>Pallets</i> <i>Slipsheets were not consistently used between pallets to protect materials from damage or contamination. Slipsheets were missing from double stacked pallets of products in bags in the warehouse.</i> <i>It was recommended that the double stacked pallets of bagged products be protected with a slipsheet to ensure product integrity.</i>	1.5	1.5.2.2	<i>Raw Material Storage</i>
7	Comments Finding Finding Finding	Release Procedures Release procedures were defined for raw materials or finished products used at this facility. Review of program requirements and records indicated that defined release procedures were followed. Review of the program and associated records indicated that only authorized personnel released product.	1.7		Facility Overview
8	Comments Finding Finding Finding	Dust Collection and Filtering Devices Dust collection and filtering devices were stored in a dust-free environment. The devices were clean and well maintained. Devices were constructed of non-shedding materials to prevent addition of threads, lint, or fibers to food products.	1.8		Facility Overview
9	Comments Finding Finding	Bulk Material Handling Bulk systems and unloading areas were installed and-or maintained to prevent product contamination. Verification of security seals and-or padlocks was a customer-facility requirement. Documentation of their use was recorded in accordance with defined requirements.	1.9		Facility Overview
10	Comments Finding Finding	Sampling Procedures Rock samples were taken at the facility. Documented sampling procedures to prevent contamination of the product and the sample taken were defined for the facility. Procedures addressed sealing and identifying openings created from product sampling. Observations during the inspection demonstrated that these procedures were followed.	1.10		Facility Overview

11	Comments	Raw Material Transfer	1.12	Facility Overview
	Finding	Procedures for transferring and handling food materials were defined and followed.		
	Finding	Containers were found to be stored off the floor and covered when not in use.		
	Finding	Spills, leaks, and waste generated from material handling were addressed in a timely manner.		
	Finding	Raw materials and packaging are inspected and cleaned prior to entry into processing areas.		
	Finding	Overwrap is removed from packaging materials prior to transport into production areas.		
12	Comments	Ingredient Sifting	1.13	Facility Overview
	Finding	Calcium Sulfate were sifted with a 38-mesh screen and tested to pass a 100 mesh screen 99.99%. Magnets are also used to protect the equipment.		
	Finding	Review and identification of unusual foreign material in sifter tailings were identified and addressed.		
	Finding	Records of tailings findings and Corrective Actions were documented and current.		
	Finding	Review of the program and documentation demonstrated that foreign materials in tailings that could have damaged the sifter screen generated a Corrective Action which included immediate inspection of the sifter screens for damage.		
13	Comments	Foreign Material Control Devices	1.15	Facility Overview
	Finding	Foreign material control devices were located at the last possible point in the production line.		
	Finding	Metal detectors were equipped with an alarm and a rejection device to divert contaminated product from the production line. Controlled access to these materials was provided.		
	Finding	Investigation of product rejections or unusual findings was completed and Corrective Actions were taken to identify and eliminate contamination sources.		
	Finding	Foreign material control devices were appropriate to the product and-or process and would aid in detection in metal wear or contamination from processing equipment.		
	Finding	Procedures for operating, monitoring, and testing foreign material control devices were documented and followed.		
	Finding	Monitoring of foreign material controlled devices was documented according to the defined frequency.		
	Finding	Corrective Actions, including reporting procedures, for failures of foreign material control devices were defined and followed.		
14	Comments	Waste Material Disposal	1.16	Facility Overview
	Finding	Trash and inedible waste was stored in covered and identified containers.		
	Finding	Trash containers were emptied daily.		
	Finding	Trash and inedible waste was segregated from raw materials and food products.		
	Finding	Licensed contractors were used to remove waste from the facility.		
	Finding	Waste disposal appeared to meet regulatory requirements.		

15	Comments Finding Finding	Product Identification Carry-over product, work-in-progress, and raw materials were properly identified and dated. Carry-over was minimal and used at the first opportunity.	1.18	Facility Overview
16	Comments Finding Finding Finding Finding	Workspace Arrangement No issues with housekeeping in production and support areas were noted during the inspection. Production equipment and supplies were properly installed and maintained. Idle equipment was not observed to be stored in production or raw material storage areas. Workspace and storage appeared to be adequate to the operations carried out at this facility. Operational debris was not considered to be excessive.	1.19	Facility Overview
17	Comments Finding Finding	Single-Service Containers No reuse of single-service containers was noted during the inspection. Appropriate disposal of single-service containers was noted during the inspection.	1.20	Facility Overview
18	Comments Finding	Hand Contact Design of the facilities and equipment minimized hand contact where possible and practical.	1.21	Facility Overview
19	Comments Finding Finding Finding Finding	Cross Contamination Prevention Materials appeared to be properly stored and segregated to prevent cross contamination. The facility has defined measures in place to prevent cross contamination from hazardous ingredients, such as allergens. The facility has implemented systems to reduce physical, chemical, and microbiological contamination. Measures were in place to prevent cross contamination that may lead to customer complaints.	1.23	Facility Overview
20	Comments Finding Finding Finding Finding	Containers and Utensils Containers and utensils used for food materials were properly handled and maintained. No misuse of containers was noted during the inspection. Containers were found to be properly labeled or color-coded. Snap-off blades were not used in production, packaging, or raw material storage areas.	1.24	Facility Overview
21	Comments Finding Finding Finding	Finished Product Transportation Legible code marks were observed on finished products. Lot codes were provided on finished products to facilitate product recall. Records of distribution were maintained to identify the initial point of distribution.	1.26	Facility Overview

	Finding	No issues with finished product handling or distribution practices were noted.		
	Finding	Covers or canopies were provided to protect products from weather damage.		
	Finding	Written transportation breakdown procedures were on file at the facility.		
	Finding	Shipping vehicles were inspected for cleanliness and structural issues prior to loading.		
	Finding	Inspections of shipping vehicles prior to loading were documented and current. Issues that could jeopardize products were identified and Corrective Actions were documented.		
	Finding	Local delivery trucks and vehicles were inspected and cleaned on a minimum of a weekly basis.		
	Finding	Common carriers and customer delivery vehicles were addressed as part of the finished product transportation program.		
	Finding	Documentation of the use of security seals and-or padlocks was documented per requirements.		
22	Comments	Hand Washing Facilities	1.27	Facility Overview
	Finding	Accessible and properly maintained hand washing facilities were provided.		
	Finding	Single use towels and-or air dyers were used at this facility.		
	Finding	Hand sanitizers were provided.		
	Finding	Wash hands signs were provided above sinks, in employee welfare and restroom areas, and in entries to production areas where appropriate.		
	Finding	Paper towel dispensers were covered and hands-free in design.		
23	Comments	Washrooms, Showers and Locker Rooms	1.28	Facility Overview
	Finding	Employee welfare areas were found to be clean and well maintained.		
	Finding	No mold or pest evidence was observed.		
	Finding	Open food containers and drinks were not noted.		
	Finding	Wash hands signs were provided in employee welfare areas.		
	Finding	A defined locker inspection program was documented and carried out.		
24	Comments	Personal Hygiene	1.29	Facility Overview
	Finding	Trained supervisors were responsible for ensuring compliance with facility personnel practice requirements.		
	Finding	Plant polices required that personnel wash hands before beginning work, and after eating, drinking, smoking, using the restroom, or otherwise soiling hands. No violations of this policy were observed.		
	Finding	Good employee hygiene practices were noted during the inspection.		
	Finding	Hand washing practices were periodically monitored for effectiveness.		
25	Comments	Work Clothes, Changing Facilities, and Personnel Areas	1.30	Facility Overview

	Finding	Personnel were observed wearing suitable clothing or uniforms that were clean.			
	Finding	Footwear appeared to be appropriate.			
	Finding	Hair nets and beard restraints were worn to provide effective hair control.			
	Finding	Tools were stored below the waist to prevent product contamination issues.			
	Finding	Employee changing facilities were provided.			
	Finding	Segregation of work clothing, outdoor clothing, and personal items was provided.			
	Finding	Shirt pockets were not observed on clothing or uniforms worn in production areas.			
	Finding	Breakrooms and dining facilities were provided for all personnel.			
26	Comments	Personal Items and Jewelry Control	1.32		Facility Overview
	Finding	Loose or unsecured jewelry was not observed.			
	Finding	Plain wedding bands were allowed by plant policy.			
	Finding	Personnel were not observed eating, drinking, or smoking in unauthorized areas.			
	Finding	Personal property was stored in appropriate locations defined by company policy.			
	Finding	Designated areas for storage of personal property were provided.			
	Finding	The Personnel Practices Program defined and explained exceptions to the plant policies.			
	Finding	Wearing of perfume or aftershave was prohibited by plant policy.			
27	Comments	Health Conditions	1.33		Facility Overview
	Finding	Effective procedures were in place to ensure that personnel with boils, sores, infected wounds, infections, or other communicable diseases were not permitted to come in contact with food as required by law.			
	Finding	Cuts and grazes were covered by metal detectable bandages that were regularly tested in the metal detector.			
	Finding	Procedures requiring personnel, including temporary workers, to notify supervisors of infections or disease that they may have been exposed to were in place.			
28	<i>Minor Issues Noted (MI)</i>	<i>Health Conditions</i>	<i>1.33</i>	<i>1.33.2.1</i>	<i>Facility Overview</i>
	<i>Finding</i>	<i>Records indicated that bandages were not regularly tested in the metal detector.</i>			
	<i>Recommendation</i>	<i>It was recommended that the bandages be tested to ensure proper compliance of the bandage manufacturer.</i>			
29	Comments	Non-Facility Personnel	1.34		Facility Overview
	Finding	Non-facility personnel, including visitors and contractors, followed the facility personnel practices requirements.			
	Finding	Plant rules and GMPs were addressed with visitors and contractors prior to entry into food handling areas of the facility.			

2.0 Maintenance for Food Safety

#	Rating	Standard	Standard #	Requirement #	Location
30	Comments Finding Finding Finding	Facility Location Facility boundaries were defined and controlled. Boundaries were clearly defined and controlled. Measures were in place to prevent contamination from local activities or neighboring properties that could impact the facility.	2.1		Facility Overview
31	Comments Finding Finding Finding Finding Finding Finding Finding	Outside Grounds Outside grounds and equipment storage was maintained in a way that prevents product contamination or pest harborage. Measures included removal of litter and managing and maintaining waste to eliminate pest attraction to the facility. Weeds and tall grass were not noted near the building. Roads, yards, and parking areas were maintained to eliminate excessive dust, standing water, or other contaminants. No issues with drainage from the roof, grounds, or other areas were observed. Outdoor waste and scrap compactors were maintained to minimize leakage and were removable to facilitate cleaning. Waste and scrap compactors were covered and located to prevent pest attraction or harborage. Equipment graveyards were minimal and maintained to prevent pest harborage and attraction.	2.2		Facility Overview
32	Comments Finding	Security Equipment Some measures were taken to maintain facility security. Security strategies included controlled parking, locked doors, limited access to sensitive areas, surveillance cameras, truck seals, employee screening, and awareness and training programs.	2.3		Facility Overview
33	Comments Finding Finding	Layout Adequate space was observed between equipment and structures to facilitate access for cleaning and maintenance activities. Adequate space was provided between equipment and raw materials.	2.4		Facility Overview
34	Comments Finding Finding Finding	Floors, Walls, and Ceilings Floors, walls, and ceilings throughout the facility were well constructed and maintained. Grated floor drains were found to be clean and in good condition. Drain grates appeared to be easily removed for cleaning and inspection.	2.5		Facility Overview

Finding Floor drainage was designed and maintained to allow access for cleaning and to prevent product contamination.

Finding No issues with drain flow in high risk areas were observed.

Finding Access to the void areas above the hollow or suspended ceiling was provided.

Finding There was no evidence of roof leakage.

Finding Ceilings, overhead structures, and walls were found to be clean and well maintained.

Finding Floor and wall structures were found to be in good repair.

Finding Floors were in good condition and appeared to be designed to withstand operations and cleaning activities.

Finding Floors were impervious.

Finding Floors were sloped to direct flow to the drains.

Finding Floor drains were easily accessible for cleaning and inspection.

Finding Equipment and drain access allowed discharge to go directly into a drain.

35	Comments Finding	Overhead Structures There was no evidence of loose materials, such as insulation, in the overheads or from production equipment in or above the product zone.	2.6		Facility Overview
36	<i>Minor Issues Noted (MI) Finding Recommendation</i>	<i>Overhead Structures Fixtures, ducts and pipes were not consistently installed and maintained to prevent contamination from loose material. Fraying insulation was noted by the walk way to the food grade area of the processing. No insulation was noted on the walkway. It was recommended that the insulation be removed to ensure no pest harborage occurs in this area.</i>	2.6	2.6.1.1	Production
37	<i>Minor Issues Noted (MI) Finding Recommendation</i>	<i>Overhead Structures Evidence of flaking paint in the overheads or from production equipment was observed outside of the product zone. Flaking paint was noted on the rock bin and framework for the rock bin. A flake of paint was noted on the wall structure in this area. It was recommended that these areas be scraped to ensure no further degradation occurs.</i>	2.6	2.6.1.2	Production
38	Comments Finding Finding Finding Finding Finding	Glass, Brittle Plastics and Ceramics Control Adequate lighting was observed in all areas. Fluorescent light tubes, light bulbs, essential glass, brittle plastics, and ceramics in the facility were of the safety type or otherwise protected from accidental breakage. Light fittings and other glass were replaced in a way to prevent potential product contamination. Glass that could not be protected was accounted for in the Glass, Brittle Plastics, and Ceramics Program. Essential glass present in the facility was managed as part of the Glass, Brittle Plastics, and Ceramics Program.	2.7		Facility Overview

39	Comments Finding Finding Finding Finding Finding Finding Finding Finding	Air Makeup Units Clean filters were provided on air make-up units. Inspection hatches were provided to allow access for cleaning and inspection. Fans, blowers, filters, cabinets, and-or plenums were maintained as part of the PM Schedule. Insect screens were provided on windows or doors used for ventilation to prevent pest entry. The cleanliness, location, and operation of air blowing equipment did not present an identified product contamination risk. Filters were in place in air makeup units to remove particles of 50 microns or larger. Windows and skylights that were not screened were non-opening. Dust extraction equipment was provided for handling dry powders. Adequate ventilation was provided.	2.8	Facility Overview
40	Comments Finding Finding Finding	Pest Prevention Adequate barriers were in place to prevent rodents, insects, and birds from entering the facility. Cracks, crevices, and other pest harborages were eliminated. Doors were pest-proofed to prevent pest entry.	2.9	Facility Overview
41	Comments Finding Finding	Leaks and Lubrication There was no evidence of leaks or excessive lubrication in product zones where contamination was likely. In areas where drive motors or gearboxes were mounted over product zones, deflector plates or catch pans were intact and maintained to prevent product contamination.	2.10	Facility Overview
42	Comments Finding Finding	Lubricants Food-grade lubricants were used on food processing equipment. Food-grade and non food-grade lubricants were labeled, segregated, and stored in designated areas.	2.11	Facility Overview
43	Comments Finding Finding Finding Finding Finding	Cross Contamination Prevention Operations were separated to prevent product contamination. Process flow from receiving to shipping was arranged to minimize product contamination. Areas for washing and cleaning were segregated from production activities as appropriate. Toilet rooms did not open directly into production, packaging, or raw material storage areas. Air curtains, partitions, doors, or other barriers were used to segregate cleaning areas from production areas.	2.12	Facility Overview
44	Comments	Design Standards	2.13	Facility Overview

	Finding	Facility design standards identified the appropriate materials and modification and repair procedures to reduce potential contamination, facilitate cleaning, and eliminate pest harborage.		
45	Comments Finding Finding Finding Finding	Equipment and Utensil Construction	2.14	Facility Overview
		Utensils were designed and constructed of materials that were easily cleaned and maintained.		
		Equipment was designed and constructed of materials that were easily inspected, cleaned, and maintained.		
		Equipment placement and installation allowed access for cleaning.		
		Wood used in contact with exposed raw materials, work-in-progress, and unwrapped finished product was clean and well maintained.		
46	Comments Finding Finding Finding	Temporary Repair Materials	2.15	Facility Overview
		The use of food-grade materials for temporary repairs was defined as part of this program.		
		Documentation of work orders and repair requests were on file and current.		
		Temporary repairs observed during the survey appeared to be in compliance with the plant defined program.		
47	Improvement Needed (IN) Finding Recommendation	Temporary Repair Materials	2.15	2.15.1.1 Facility Overview
		Some paper towels were used to seal a leak on the finish product bin silo at the bottom slide gate. The paper towels were stuffed between the framework of the transition chute.		
		It was recommended that the holding bin be repaired properly to ensure no pests develop in the paper towels.		
48	Comments Finding Finding	Food Contact Surface Construction	2.16	Facility Overview
		Food contact surfaces were smooth, corrosion-free, and constructed of non-toxic material.		
		No spot or tack welds were identified.		
49	Comments Finding Finding Finding	Compressed Air	2.18	Facility Overview
		Compressed air used in processing was properly filtered to remove particles of 5 microns or larger.		
		Air traps and filters were designed so that they could be routinely changed and inspected without contaminating product.		
		Filters for air used on product or product contact surfaces were located close to the point of use.		
50	Comments Finding Finding	Transporting Equipment	2.19	Facility Overview
		Transporting equipment, such as forklifts and pallet jacks, was maintained to prevent contamination of materials.		
		Cleaning of transporting equipment was formally tracked and included follow up.		
51	Comments	Parts Storage	2.20	Facility Overview

Finding Food contact parts were stored off the floor in a clean environment.
 Finding No storage of used or soiled conveyor belts was noted.
 Finding Clean parts and equipment were observed in parts storage areas.

52	Comments	Water Quality	2.21	Facility Overview
	Finding	Water was used at the facility and complied with regulatory requirements.		
	Finding	The water supply was potable and obtained from an approved source.		
	Finding	A program was in place to monitor water quality and records were provided.		
	Finding	Records of the results of water testing were on file and current. The last water test took place on August 12, 2011 for E. coli and total Coliform.		
	Finding	The program included water, ice, and steam used for food contact.		
	Finding	Back siphonage devices were provided and maintained to prevent backflow and back siphonage.		
	Finding	Records of checks of the devices were current. The last backflow test took place on June 6, 2011.		
	Finding	Sewage disposal systems were maintained to prevent direct or indirect product contamination.		
	Finding	Water treatment chemicals used in direct or indirect product contact were approved for food contact.		
	Finding	Results of testing indicated that water treatment chemicals were used in accordance with label directions.		
	Finding	Backflow and back siphonage devices were included in the Preventive Maintenance Program.		
53	Comments	Hand Washing Facilities Design	2.22	Facility Overview
	Finding	Hand washing facilities were provided with hot and cold running water.		
	Finding	An adequate supply of water was provided.		
	Finding	Hand washing facilities were labeled and separated from utensil washing facilities.		
	Finding	Hands-free equipment was provided where possible and practical.		
	Finding	Mix valves were provided to allow water temperatures to be adjusted.		

3.0 Cleaning Practices

#	Rating	Standard	Standard #	Requirement #	Location
54	Comments	Cleaning	3.1		Facility Overview
	Finding	Observations indicated that cleaning was done in a way to prevent contamination of raw materials, products and equipment.			
55	Comments	Food Contact Cleaning Compounds and	3.2		Facility Overview

	Finding	Sanitizers Food contact approval documentation was provided for cleaning chemicals and sanitizers used to clean food contact surfaces.			
	Finding	Sanitizer concentrations were tested to ensure that their use complied with label directions.			
	Finding	Cleaning chemicals were found to be properly labeled.			
	Finding	Chemicals were stored in secured areas away from production and food storage areas.			
	Finding	Records of verification and testing of chemical concentrations, retesting, and Corrective Actions were provided.			
56	Comments	Equipment and Tools	3.3		Facility Overview
	Finding	Adequate cleaning equipment and tools were available.			
	Finding	Cleaning equipment was maintained and stored to prevent product contamination.			
	Finding	Separate and distinct utensils were used for cleaning product zones and product areas.			
	Finding	Drain and restroom cleaning utensils were segregated from use for other cleaning purposes.			
	Finding	Cleaning utensils were properly cleaned and stored after use.			
	Finding	Cleaning tools were labeled or color-coded to separate them based on their intended use.			
57	Comments	Daily (Housekeeping) Cleaning	3.4		Facility Overview
	Finding	Daily housekeeping cleaning activities were carried out in a way that prevents contamination.			
	Finding	Housekeeping activities were assigned to the appropriate department.			
	Finding	Daily cleaning activities included work and support areas during production.			
	Finding	Water used for daily cleaning activities was controlled to prevent contamination of raw materials, work-in-progress, or production equipment.			
58	Comments	Periodic (Deep) Cleaning	3.5		Facility Overview
	Finding	Periodic cleaning tasks complied with written procedures.			
	Finding	Cleaning tasks were assigned.			
	Finding	Equipment cleaning included removal and replacement of panels, trim, etc. to allow access for cleaning of interior of the equipment.			
	Finding	Equipment and overhead structures were included for periodic cleaning according to the Master Cleaning Schedule.			
	Finding	Air hoses with restricted head pressure were used for cleaning of inaccessible equipment.			
	Finding	Air hoses were used for cleaning when the facility was not in operation to prevent product contamination.			
59	<i>Minor Issues Noted (MI)</i>	<i>Periodic (Deep) Cleaning</i>	<i>3.5</i>	<i>3.5.1.2</i>	<i>Production</i>
	<i>Finding</i>	<i>Deep cleaning of equipment was not consistent with the frequencies defined on the Master Cleaning Schedule. Heavy buildup was noted on the supports and in the corners on the floors. This product is not conducive to insects.</i>			

<i>Recommendation</i>		<i>It was recommended that these areas be cleaned so no pests harborages occur.</i>		
60	Comments Finding Finding Finding Finding Finding Finding Finding	Maintenance Cleaning Maintenance cleaning appeared to be completed in a way that prevented product contamination. Non-sealed electrical panels and boxes in areas susceptible to insect development were cleaned and inspected every four weeks. No evidence of maintenance debris was observed. Nuts, bolts, washers, and other maintenance related materials were accounted for. Excess lubrication and grease smears were removed from equipment. Clean tools or cloths were used for cleaning in product zones. Maintenance personnel were observed following GMPs during the inspection. Areas were inspected for debris when the use of sponges, scrub pads, and wire brushes was necessary for cleaning.	3.6	Facility Overview
61	Comments Finding Finding Finding Finding Finding Finding	Food Contact Surface Cleaning Food contact surfaces and utensils were cleaned and sanitized as appropriate to remove contaminants. Equipment and utensils were cleaned and sanitized on a predetermined schedule to prevent microbiological contamination. Utensils were washed and dried between uses and stored in an inverted position off the floor. Utensils, containers, and product zones were cleaned to prevent residues from being transferred to other products. Sanitary trays and dollies were clean and well maintained. Nonfood contact surfaces were clean and well maintained.	3.7	Facility Overview

4.0 Integrated Pest Management

#	Rating	Standard	Standard #	Requirement #	Location
62	Comments Finding Finding Finding Finding	Integrated Pest Management (IPM) Program A written Integrated Pest Management Program (IPM) was in place for this facility. The IPM Program addressed the requirements of the facility's Prerequisite and Food Safety Programs. Records of training or licensing of the IPM service providers were documented and current. Responsibilities were defined for in-house personnel and the IPM contractor.	4.1		Facility Overview
63	Comments Finding	Facility Assessment The annual IPM assessment included evaluation of all areas inside and outside of the facility.	4.2		Facility Overview

Finding Documentation of findings and Corrective Actions was provided based on the assessment.
 Finding Trained personnel completed the assessment.

64	Improvement Needed (IN) Finding Recommendation	Facility Assessment No facility assessment had been conducted or documented. It was recommended that an assessment occur to ensure the PCO competency and compliance with the standard.	4.2	4.2.1.1	Facility Overview
65	Comments Finding	Other Guidelines The IPM Program was managed under alternative guidelines.	4.3		Facility Overview
66	Comments Finding	Signed Contracts All defined IPM contract elements, as applicable to the facility, were documented and current.	4.4		Facility Overview
67	Comments Finding Finding Finding Finding Finding	Credentials and Competencies Current documentation of certification or licensing was on file for all personnel providing IPM services at this facility. GMP training records for IPM service providers were on file. IPM service providers were supervised by a licensed applicator. A current copy of the IPM service provider business license was on file. A current certificate of insurance was on file. Evidence of competency of the service provider was provided through either the current license or examination.	4.5		Facility Overview
68	Comments Finding Finding Finding	Pesticide Documentation MSDS were provided for the pesticides listed as being applied at this facility. Labels were provided for the pesticides listed as being applied at the facility. Labels and MSDS were provided in the language of the country.	4.6		Facility Overview
69	Comments Finding	Pesticide Application Documentation Documentation of pesticide applications were completed in accordance with the defined requirements of this Standard.	4.7		Facility Overview
70	Comments Finding Finding	Pesticide Control Pesticide review and approval prior to use was documented in accordance with the Chemical Control Program. Spill control materials were in place and procedures were documented.	4.8		Facility Overview
71	Comments	Trend Analysis	4.9		Facility Overview

	Finding	Service records were documented and reflected current levels of pest activity and recommendations for Corrective Actions.		
	Finding	Pest-sighting logs were used and included the response taken.		
	Finding	Records were maintained and readily available for review.		
	Finding	The pest-sighting log was maintained in a designated location.		
	Finding	Pest sightings documented in the log included the elements defined in this Standard.		
	Finding	The pest-sighting logs were reviewed on a quarterly basis to identify trends in pest activity.		
	Finding	Corrective Actions were documented for identified issues.		
72	Comments	Monitoring Device Documentation	4.10	Facility Overview
	Finding	Placement of monitoring devices was based on the facility survey.		
	Finding	The pest monitoring device map appeared to be accurate and current.		
	Finding	Temporary placement of short-term monitoring devices was documented and included in the IPM Program.		
	Finding	Service records were current for all pest monitoring devices.		
	Finding	Records documenting servicing of these devices were current.		
	Finding	Service records for the monitoring devices were consistent with the program.		
73	Comments	Exterior Monitoring Devices	4.11	Facility Overview
	Finding	Exterior monitoring device placement was based on the facility survey.		
	Finding	Inspection of exterior monitoring devices occurred on a minimum monthly frequency.		
	Finding	Rodenticides were used in secured exterior bait stations.		
	Finding	The bait stations (#23, #3, #1, #14, #11, #20) that were randomly inspected were found to be tamper resistant, properly positioned, secured, locked and labeled.		
	Finding	Approved rodenticides were used only in the exterior bait stations.		
	Finding	Rodenticide in the stations was found to be secure and in good condition.		
	Finding	Device placement appeared to be in line with the activity noted at this facility		
74	Comments	Interior Rodent Monitoring Devices	4.12	Facility Overview
	Finding	Bait was not used for interior monitoring.		
	Finding	Interior monitoring device placement appeared to be appropriate based on the facility survey.		
	Finding	Adequate numbers of devices were placed on perimeter walls.		
	Finding	Monitoring devices were inspected weekly and found to be clean and functional.		
	Finding	Interior monitoring devices that were consistent with defined regulatory requirements were used at this facility.		
	Finding	Interior monitoring devices (#16, #2, #26, #18, #9) appeared to be adequate in number and placement.		

75	Comments Finding	Bird Control Bird exclusion methods were used to prevent bird roosting and nesting at this facility.	4.15		Facility Overview
76	Comments Finding Finding	Wildlife Control Wildlife, including domestic animals, were not observed at the time of the survey. Wildlife control measures were implemented and appropriate.	4.16		Facility Overview
77	Comments Finding	Pest Habitat Pest habitats and pest activity were identified and eliminated. No evidence of rodent or insect activity was noted in or around the facility.	4.17		Facility Overview

5.0 Adequacy of Prerequisite and Food Safety Programs

#	Rating	Standard	Standard #	Requirement #	Location
78	Comments Finding Finding Finding Finding Finding	Written Policy The facility had a documented Policy Statement outlining its commitment to produce safe and legal products. The statement is signed. The Policy Statement is communicated throughout the facility. The Policy Statement is regularly reviewed by senior management. Training against the Policy Statement was complete and current.	5.1		Facility Overview
79	Comments Finding Finding Finding Finding	Accountability Implementation of the effectiveness of the Prerequisite and Food Safety Programs was monitored. A current and accurate organizational chart was provided. The responsibility for ensuring regulatory compliance was defined. The facility had a designated process for remaining current on changes in legislation, food safety issues, scientific, technical, and industry developments. Requirements were maintained at the facility or corporate level.	5.2		Facility Overview
80	Comments Finding	Support Based on a review of the facility and related documentation, an appropriate budget and adequate labor support appeared to be in place to maintain the timely acquisition of tools, equipment, monitoring devices, chemicals, and other required resources.	5.3		Facility Overview

81	Comments Finding Finding Finding Finding	Written Procedures Written procedures were established to define step-by-step processes to ensure product safety. A regular review of written procedures for effectiveness and suitability was formalized. Written procedures addressed the requirements of this Standard. Written procedures were readily available.	5.4		Facility Overview
82	Comments Finding Finding Finding Finding	Training and Education Training records for personnel were maintained and current. The training program defined requirements for ensuring comprehension of the information presented. Training was provided to all new employees, contractors, or temporary personnel prior to beginning work at the facility. Annual refresher training was provided and current. The last training took place on March 26, 2011.	5.5		Facility Overview
83	<i>Minor Issues Noted (MI)</i> Finding <i>Recommendation</i>	<i>Training and Education</i> <i>Training did not appear to be fully effective based on observations and findings noted at this facility. Slipsheets were missing from double stacked pallets in the warehouse.</i> <i>It was recommended that a review of the slipsheet policy occur to ensure complete understanding.</i>	5.5	5.5.1.1	Facility Overview
84	Comments Finding Finding Finding Finding Finding Finding Finding	Self-Inspections Self-inspections were conducted by the Food Safety Committee. Monthly self-inspections of the entire facility, including the outside grounds, were conducted. Self-inspection findings were brought to the attention of the person responsible for the area or activity inspected. Time lines for Corrective Actions were set. Follow up of Corrective Actions was completed. The Food Safety Committee was comprised of personnel representing different departments. Verification of Corrective Action was completed during follow-up inspections.	5.6		Facility Overview
85	<i>Minor Issues Noted (MI)</i> Finding <i>Recommendation</i>	<i>Self-Inspections</i> <i>Inspection results did not consistently include observations, Corrective Actions, specific assignments, and actual accomplishments. The last self-inspection took place on September 19, 2011. Twenty-five issues were documented on the last self-inspection. Several holes in the walls were noted on the document.</i> <i>It was recommended the continued intensity occur on the self-inspections to ensure continued food safe environment.</i>	5.6	5.6.1.3	Facility Overview
86	Comments Finding	Written Procedure Audits A risk-based audit of procedures was documented by competent inspectors at least annually. The last assessment	5.7		Facility Overview

		took place on September 22, 2010.	
	Finding	Auditors were independent of the area of operation being audited.	
	Finding	Audit documentation included identified observations, specific assignments, Corrective Actions, and actual accomplishments.	
	Finding	Self-inspection findings were brought to the attention of the person responsible for the area or activity inspected.	
	Finding	Time lines were set for Corrective Action implementation.	
	Finding	Results of Corrective Actions were verified for completion.	
87	Comments	Customer Complaint Information	5.8 Facility Overview
	Finding	A written program for evaluating customer complaints was established.	
	Finding	This program included a plan for quick distribution of complaint information to all departments responsible for implementing Prerequisite and Food Safety Programs.	
	Finding	Actions appropriate to the seriousness and frequency of the complaints appeared to be carried out promptly.	
	Finding	Complaint information appeared to be used to implement ongoing improvements to avoid issue recurrence and ensure product safety.	
88	Comments	Chemical Control Program	5.9 Facility Overview
	Finding	A written Chemical Control Program that addresses all chemicals used in the facility was established.	
	Finding	Procedures were in place and addressed and incorporated the procedural elements of the Standards that were applicable to this facility.	
89	Comments	Allergen Control Program	5.11 Facility Overview
	Finding	A documented Allergen Control Program was in place to address the allergens used or handled at this facility. No allergens are present at this facility other than the break rooms.	
	Finding	The Allergen Control Program included the applicable procedures for this facility as defined in this Standard.	
	Finding	Program updates were made when there were changes in ingredients, ingredient suppliers, products, processes, and labeling.	
	Finding	Records reviewed indicated conformance to Program requirements or Corrective Actions when requirements were not met.	
90	Comments	Glass, Brittle Plastics, and Ceramics Program	5.12 Facility Overview
	Finding	The facility had a written policy stating that no glass, brittle plastics, or ceramics were to be used in the facility except where absolutely necessary	
	Finding	Policies addressed the use of glass, brittle plastics and ceramics only where necessary and removal was not feasible, and that these materials would not be brought into the facility in personal belongings.	
	Finding	Included in the policy was a procedure to handle any breakage in the facility. A list of all essential glass, brittle	

plastics, and ceramics was developed, and scheduled inspections were conducted. The last inspection took place on September 2011.

91	Comments Finding Finding Finding Finding Finding	Cleaning Program A written Cleaning Program was developed for the facility. The MCS specified frequency, responsibility, post-cleaning evaluation techniques, and Corrective Actions. Written cleaning procedures were developed for all equipment, structures, and grounds that impacted storage, processing, and packaging of food products. Procedures included chemicals and chemical concentrations (where applicable), tools, and disassembly instructions appropriate to the facility. Cleaning tasks included daily, periodic and maintenance cleaning.	5.13		Facility Overview
92	<i>Minor Issues Noted (MI)</i> Finding Recommendation	<i>Cleaning Program</i> <i>The formal documented Cleaning Program that included a Master Cleaning Schedule (MCS) for periodic cleaning assignments, as well as a daily housekeeping schedule, was not fully developed and implemented in this facility. The framework is scheduled to be cleaned once a year. Heavy build-up was noted on the framework in the processing areas.</i> <i>It was recommended that increased frequency occur in these areas to ensure proper cleaning occurs.</i>	5.13	5.13.1.2	Facility Overview
93	Comments Finding Finding	Preventive Maintenance Program Procedures included post-maintenance cleaning, notification of appropriate personnel, tools and parts reconciliation, and records of evaluation and sign off of equipment before it is placed back into service. Records reviewed indicated that the Program requirements were being met.	5.14		Facility Overview
94	<i>Minor Issues Noted (MI)</i> Finding Recommendation	<i>Preventive Maintenance Program</i> <i>A partially developed Preventive Maintenance Program and work order system was implemented for this facility. The last "PM" for the finished product bin silo took place on October 6, 2011. The "PM" did not specifically address the slide gate area.</i> <i>It was recommended that the "PM" be modified to include areas of potential break downs to ensure proper functioning and repairs occur.</i>	5.14	5.14.1.1	Facility Overview
95	Comments Finding Finding Finding Finding	Receiving Program A written Receiving Program was in place for the facility. Incoming ingredients, packaging, and transports received into the facility were inspected by trained personnel according to established written procedures. Procedures for inspecting incoming raw materials were documented. Written requirements included evaluation for the condition of the raw material, presence of pest evidence, presence	5.15		Facility Overview

		of objectionable materials, and the condition of the transport.		
	Finding	Inspection procedures addressed LTL vehicles.		
	Finding	Inspection results were documented.		
	Finding	Records reviewed indicated that documentation for incoming material inspections met the Program requirements.		
96	Comments	Regulatory Affairs and Inspection Program	5.16	Facility Overview
	Finding	A written Regulatory Affairs and Inspections Program was on file. The Program included a list of personnel delegated to accompany all inspectors along with the company policy regarding recording devices, cameras, records, and sample taking. The last inspection took place on February 23, 2011.		
97	Comments	Food Defense Program	5.17	Facility Overview
	Finding	Evidence of registration under the FDA Bioterrorism Act was on file at the facility.		
	Finding	The facility had conducted a Vulnerability Assessment to identify food defense risks. The last assessment took place on September 22, 2010.		
	Finding	The written Food Defense Plan included a trained Coordinator, team members and contact information, key regulatory agencies and contact information, first responders and their contact information, annual training, and an annual Program review.		
98	Comments	Traceability Program	5.18	Facility Overview
	Finding	A written Traceability Program was implemented for this facility.		
	Finding	The Program addressed identification of lot numbers of raw materials, rework, food contact packaging materials, work-in-progress, finished product, distribution, and processing aids.		
	Finding	All finished products were coded and recorded.		
99	Comments	Recall-Withdrawal Program	5.19	Facility Overview
	Finding	A written Recall-Withdrawal Program was on file.		
	Finding	Distribution records were maintained to identify the initial point of distribution to facilitate segregation and recall of specific lots.		
	Finding	The Recall Program was tested twice annually and test results were documented and included the success rate and the time it took to complete the exercise. The last mock recall took place on September 15, 2011.		
	Finding	The mock recall exercise included the first level of distribution outside of the control of the facility.		
	Finding	At least one of the tests included an ingredient or food contact packaging material.		
	Finding	The written Recall-Withdrawal Program included Recall-Crisis Management team contact information, roles and responsibilities of team members, location of the Traceability Program, key regulatory agency contact information, supplier and customer emergency contact information, and sample recall-withdrawal notification letters.		

100	Comments	Nonconforming Product Program	5.20	Facility Overview
	Finding	A written Program was in place to control nonconforming products, including work-in-progress, finished products, and returned goods.		
	Finding	Procedures addressed investigation of the non-conformity and identification of food safety risks, time-sensitive Corrective Actions based on the severity of risk, documentation of actions taken, and handling and disposition of the product.		
	Finding	Disposition of nonconforming materials was traceable for recall or withdrawal.		
	Finding	Disposition included rejection, acceptance with restrictions, or regrading of product as applicable to the facility.		
	Finding	Inventories of damaged and destroyed materials were documented.		
101	Comments	Approved Supplier Program	5.21	Facility Overview
	Finding	A written program outlining the evaluation, selection, and maintenance of suppliers of goods and services that affect product quality and food safety had been implemented.		
	Finding	Procedures addressed the list of approved and unapproved suppliers, evaluation selection and maintenance of approved suppliers, actions to take when inspections or monitoring had not occurred, and standard of performance including ongoing assessment of suppliers.		
	Finding	Supplier performance monitoring was included as part of the Supplier Approval Program.		
	Finding	Supplier performance monitoring methods and frequency were based on risk.		
	Finding	Laboratories used for analysis were accredited by a competent body.		
102	Comments	Specification Program	5.22	Facility Overview
	Finding	Appropriate specifications were on file for raw materials, food contact packaging materials, finished products, work-in-progress, and processing aids evaluated during the inspection.		
	Finding	These specifications were detailed to ensure compliance with relevant food safety and legislative requirements and were reviewed and agreed upon.		
103	Comments	Letters of Guarantee or Certifications	5.23	Facility Overview
	Finding	Letters of Guarantee or Certifications for received materials and finished products were on file and current for materials reviewed during the survey.		
	Finding	Letters of Guarantee indicated compliance with Defect Action Levels (DALs) for raw materials, finished product, and packaging as applicable.		
104	Comments	HACCP Program	5.25	Facility Overview
	Finding	A Hazard Analysis Critical Control Point (HACCP) Program was developed and implemented for processes and process lines and incorporated Prerequisite Programs.		
	Finding	The Plan was signed by senior management.		
	Finding	The HACCP Plan was managed by a trained HACCP team leader with assistance of HACCP trained team members.		

Finding	Finished Product Profiles were provided for each product produced.
Finding	A current Process Flow Diagram was in place.
Finding	The Seven Principles of HACCP were followed in the development of the HACCP Program and included a risk assessment for both the ingredients and the process.
Finding	Documented training was current for management and non-management personnel and for those with designated CCP responsibilities.
Finding	CCPs were identified, controlled, and monitored in accordance with the Master Plan.
Finding	Documented review of the HACCP Program occurred at least annually or where there were changes to the product or process.

STANDARDS NOT IN SCOPE

Standard #	Standard
1.6	Designated Rework Areas
1.11	Processing Aids
1.14	Bulk Liquid Ingredients
1.17	Ingredient Scoops
1.22	Temperature-Sensitive Materials
1.25	Cans, Bottles, and Rigid Packaging
1.31	High-Risk Clothing Management
2.17	Temperature Measuring Devices
4.13	Insect Light Traps
4.14	Pheromone Monitoring Devices
5.10	Microbial Control Program
5.24	High-Risk Processing Record Program