SQFI Audit Report

I. Company Information

Company Name	Wingate Packaging - Blue Ash			**Company #**	5921
Address	4347 Indecco Ct				
City	Blue Ash	**State**	Ohio	**Zip Code**	45241
Country	United States	**Phone #**	513-745-8600 X6122		
SQF Practitioner	Tiffany Reese	**Email**	Tiffany.Reese@wingate-packaging.com		
Food Sector Categories	27 - Manufacture of Food Sector Packaging Materials				
Modules Audited	Module 2 Level 2, Module 13				
Certified Products	Food contact and non-food contact packaging				

II. Certification Body

Certifying Body	NSF Food Safety Certification LLC			**CB #**	NSF
Address	789 N. Dixboro Rd.				
City	Ann Arbor	**State**	MI	**Zip Code**	48105
Country	United States of America	**Phone #**	(734) 769-8010		
Accreditation Body	ANSI Accreditation Program	**Accreditation Number**	1181		

III. Audit Schedule

Certification Type	Recertification	**Level**	LEVEL 2
Start Date	7/Dec/2017	**End Date**	8/Dec/2017
Scope of Certification	Exclusions: Scope: Packaging - Food and non food contact		

IV. Audit Team

First Name	Last Name	Person #	Role
Rosalyn	White	122143	Lead Auditor

V. Audit Duration

Actual Start Date	7/Dec/2017	**Actual End Date**	8/Dec/2017
Hours Spent at Facility	16	**Hours Spent Writing Report**	8

VI. Certification Decision

Certificate Decision Date	02/Jan/2018	**Certificate Issue Date**	04/JAN/2018

Audit Score	97%	**Audit Rating**	Excellent
Certification #	639671		
Re-certification Date	19/DEC/2018	**Expiration Date**	04/MAR/2019
Surveillance Audit Due Date		**Certification Decision**	Certify

VII. Non-Conformities

Element	Description	Primary Response	Evidence
2.9.1.1	Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF level 2 system and the maintenance of food safety and regulatory requirements.	Minor	Senior Management Team training records were not available for the following procedures: Crisis Management Action Program, Defense Security Program and Product Withdrawal / Recall Action Program.
13.2.7.2	Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any handling or storage area: routine maintenance of plant and equipment shall be performed according to a maintenance-control schedule and recorded, failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule, compliance with the personnel and process hygiene requirements (refer to elements 13.3.1, 13.3.2, 13.3.3, 13.3.4) by maintenance staff and contractors, ensure area supervisors are notified when maintenance or repairs are to be undertaken in any packaging manufacturing area. inform the maintenance supervisor and the facility supervisor if any repairs or maintenance that pose a potential threat to product safety	Minor	Quarterly Press point of use filter change records were not available for the second quarter of 2017.

	(i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times. remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of facility operations.		
13.2.7.5	Paint used in a production area shall be suitable for use and in good condition and shall not be used on any product contact surface.	Minor	Flaking paint was observed near the product path on Press#6.

VIII. Root Cause Analysis (To be completed by supplier)

Element	Description	Primary Response	Root Cause
2.9.1.1	Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF level 2 system and the maintenance of food safety and regulatory requirements.	Minor	The only Senior Management member listed on the training log was the Plant Manager, therefore, the other managers were not targeted for training.
13.2.7.2	Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any handling or storage area: routine maintenance of plant and equipment shall be performed	Minor	No back-up documentation or work order was completed to verify this record therefore it was overlooked and not registered as completed on the PM schedule.

	according to a maintenance-control schedule and recorded, failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule, compliance with the personnel and process hygiene requirements (refer to elements 13.3.1, 13.3.2, 13.3.3, 13.3.4) by maintenance staff and contractors, ensure area supervisors are notified when maintenance or repairs are to be undertaken in any packaging manufacturing area. inform the maintenance supervisor and the facility supervisor if any repairs or maintenance that pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times. remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of facility operations.		
13.2.7.5	Paint used in a production area shall be suitable for use and in good condition and shall not be used on any product contact surface.	Minor	The flaking paint had been wiped away and disposed of, however, the area of missing paint had not been re-painted or sealed to prevent further damage.

IX. Corrective Actions

Clause	Primary Response	Corrective Action *(Supplier)*	Verification of Closeout *(Certification Body)*	Required Completion Date	Close Out *(CB)*
2.9.1.1 Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF level 2 system and the maintenance of food safety and regulatory requirements.	Minor	The SQF Practitioner sat with the Senior Management team for training sessions reviewing the Crisis Management, Defense-Security, and Recall programs. All other programs were reviewed to see if any other training needed to be conducted at this time and none were found.	CAR Approved- KP	07/Jan/2018	02/Jan/2018
13.2.7.2 Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any handling or storage area: routine maintenance of plant and equipment shall be performed according to a maintenance-control schedule and recorded, failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule, compliance with the personnel and process hygiene requirements (refer to elements 13.3.1, 13.3.2, 13.3.3, 13.3.4) by maintenance staff and contractors, ensure area supervisors are notified when maintenance or repairs are to be undertaken in any packaging manufacturing area. inform the maintenance supervisor and the facility supervisor if any repairs or maintenance that pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times. remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of facility operations.	Minor	The records were reviewed and updated. A work order was assigned and completed for the point of use filter for the next due date (WO1843 attached for January). A work order section was added to the PM schedule and work orders were then assigned to the remainder of all quarterly and annual PMs for the 1st quarter starting in January (Filter example circled on 2nd page of schedule attached). The PM schedule was reviewed to insure there weren't any other missing actions, and all were complete.	CAR Approved- KP	07/Jan/2018	02/Jan/2018

13.2.7.5 Paint used in a production area shall be suitable for use and in good condition and shall not be used on any product contact surface.	Minor	Maintenance has applied a heat resistant paint to seal the area on the heater box on press 6. The presses were inspected for any other signs of missing paint, and those areas were touched up as well.	CAR Approved- KP	07/Jan/2018	02/Jan/2018

Audit Statement

Header	Item	Evidence
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by comas)	Tiffany Reese: SQF Practitioner, Senior Management Team, Rosalyn White: Lead Auditor
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by comas)	Tiffany Reese: SQF Practitioner, Senior Management Team, Rosalyn White: Lead Auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details	This is a SQF Level 2, Food Sector Category 27 (Manufacture of food sector packaging material) Re-Assessment audit conducted at Wingate Packaging's facility located in Blue Ash, Ohio. The 44,000 square foot facility is located on 2.6 acres of land and has approximately 65 employees. The facility manufactures bacon L-boards and U-boards for use as direct food contact packaging.
Auditor Recommendation	Auditor Recommendation	Maintain certification

2.1.1 Management Policy

Element	Description	Primary Response	Evidence
2.1.1.1	Senior management shall prepare and implement a policy statement that outlines as a minimum: the organization's commitment to supply safe food; the methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and the organization's commitment to establish and review food safety objectives.	Compliant	
2.1.1.2	The policy statement shall be: signed by senior management; made available in language understood by all staff; and displayed in a prominent position and effectively communicated to all staff,	Compliant	

2.1.1 Management Policy Summary

The supplier has a food safety Policy Statement that is implemented by senior management. It is signed by the senior manager, dated 12-20-16. The Policy statement covers customer and regulatory requirements, the use of continuous improvement of the system and the review of food safety objectives. The Policy is written in English and is communicated to the facility's staff by way of postings and during refresher training. The policy was observed to be posted in various locations throughout the facility.

2.1.2 Management Responsibility

Element	Description	Primary Response	Evidence
2.1.2.1	The organizational reporting structure describing those who have responsibility for food safety shall be defined and communicated within the organization.	Compliant	
2.1.2.2	The senior management shall make provision to ensure fundamental food safety practices are adopted and maintained.	Compliant	
2.1.2.3	The senior management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.	Compliant	
2.1.2.4	The senior management shall designate an SQF practitioner for each site with responsibility and authority to oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals outlined in 2.4.2, and the food safety plan outlined in 2.4.3; to take appropriate action to ensure the integrity of the SQF System; and, communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.	Compliant	
2.1.2.5	The SQF practitioner shall be employed by the supplier as a company employee on a full-time basis, hold a position of responsibility in relation to the management of the supplier's SQF System, have completed a HACCP-based	Compliant	

	training course and be competent to implement and maintain HACCP-based food safety plans, have an understanding of the SQF Code level 2 and the requirements to implement and maintain SQF Systems relevant to the supplier scope of certification.		
2.1.2.6	The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented.	Compliant	
2.1.2.7	All staff shall be informed of their responsibility to report food safety problems to personnel with authority to initiate action.	Compliant	
2.1.2.8	Job descriptions for those responsible for food safety shall be documented and include provision to cover for the absence of key personnel.	Compliant	
2.1.2.9	The senior management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement.	Compliant	

2.1.2 Management Responsibility Summary

An organizational chart, dated 5-23-17 is kept on file electronically and maintained by Human Resources. outlines the structure of staff having responsibility for food safety. Senior management has communicated this to the organization and provide the resources for implementation of the food safety Systems. Both the SQF Practitioner (Corporate Quality Manager) and the back-up Practitioner (Corporate Quality Assurance Manager) are full time employees of the company. Observed Practitioner HACCP training (Dated: 9-14) conducted by the Ohio Department of Agriculture. Observed back-up Practitioner HACCP training (Dated: 6-13). The SQF Practitioner is responsible for the development, implementation and maintenance of the SQF System. Job descriptions are written for staff responsible for food safety with coverage for absenteeism assigned. Job descriptions for the Corporate Quality Manager (Back-up: Corporate Quality Assurance Manager) and Plant Manager (Back-up: Corporate Operations, Procurement and Engineering) were reviewed. Plant staff is required to report food safety/quality issues to management, as evidenced by the Food Safety Manual and interviews with 3 employees in the production area.

2.1.3 Food Safety and Quality Management System (M)

Element	Description	Primary Response	Evidence
2.1.3.1	A food safety manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the organization will use to meet the requirements of this Standard, be made available to staff and include a summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard, policy statement and organization chart, the scope of the certification, and include a list of the products covered under the scope of certification.	Compliant	
2.1.3.2	A food safety manual shall be documented, maintained, made available to relevant staff and include or reference the written procedures, pre-requisite programs, food safety plans and other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.	Compliant	

2.1.3 Food Safety and Quality Management System (M) Summary
A food safety manual has been developed, documented and maintained in electronic and hardcopy format and called the Food Safety and Quality Manual, dated: 12-5-17. It is maintained by the SQF Practitioner. Policies and procedures are documented in the Food Safety and Quality Manual and outline how the SQF Code are met. The food safety manual contains the scope of the certification, a list of products in the scope, the organizational chart and all food safety policies and procedures that make up the SQF System of this supplier. It is made available to all relevant staff by means of new employee orientation and refresher training.

2.1.4 Management Review (M)

Element	Description	Primary Response	Evidence
2.1.4.1	The senior management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include the policy manual, internal and external audit findings, corrective actions and their investigations and resolution, customer complaints and their resolution and investigation.	Compliant	
2.1.4.2	The SQF System in its entirety shall be reviewed at least annually.	Compliant	
2.1.4.3	Food safety fundamentals and food safety plans shall be reviewed when any changes implemented have an impact on the supplier's ability to deliver safe food.	Compliant	
2.1.4.4	Changes to food safety fundamentals and/or food safety/quality plans that have an impact on the supplier's ability to deliver safe food are to be validated.	Compliant	
2.1.4.5	Records of all reviews and reasons for amending documents, validations and changes to the SQF System shall be maintained.	Compliant	

2.1.4 Management Review (M) Summary
The entire SQF System is reviewed annually by management with the last review documented and completed on 5-10-17. The review includes the food safety manual, internal and external audit findings, the investigations and resolutions of corrective actions and customer complaints with investigations and trends. Food safety fundamentals and the food safety plans are reviewed by management when any changes are made in products and systems. The SQF practitioner is responsible for maintaining records of all reviews, validations and changes to the SQF System. This is indicated in the Quality Systems Programs Review procedure dated: 6-21-11.

2.1.5 Complaint Management

Element	Description	Primary Response	Evidence
2.1.5.1	The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities shall be documented and implemented.	Compliant	
2.1.5.2	Trends of customer complaint data shall be investigated and analyzed by	Compliant	

	personnel knowledgeable about the incidents.		
2.1.5.3	Corrective action shall be implemented commensurate with the seriousness of the incident and as outlined under 2.5.5.	Compliant	
2.1.5.4	Records of customer complaints and their investigations shall be maintained.	Compliant	

2.1.5 Complaint Management Summary

The supplier's written Complaint policy has been documented and is entitled Customer Complaint Policy/Procedures, dated: 3-17-16. It defines the methods and responsibilities for handling customer complaints. This program has been properly implemented. Complaints are handled by the Quality Department. The investigation of complaints is handled by Plant Management and Quality, with corrective actions and records kept of each complaint and resolution. The supplier also analyzes trends of complaint data. Records of complaints were reviewed for 2017 complaints (2017-1, 2017-2, 2017-3, 2017-4, 2017-5). These records showed evidence that investigation and corrective actions had been put into place. Trending graphs of complaints for the time period 1-1-16 to 12-7-17 were also reviewed.

2.1.6 Business Continuity Planning

Element	Description	Primary Response	Evidence
2.1.6.1	A business continuity plan based on the understanding of known food safety threats to a business shall be prepared by senior management outlining the methods and responsibility the organization will implement to cope with a business crisis that may impact on the ability of the supplier to deliver safe food.	Compliant	
2.1.6.2	The business continuity plan shall include as a minimum a senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident; the nomination and training of a crisis management team; controls implemented to ensure a response to a crisis does not compromise product safety; measures to isolate and identify product affected by a response to a crisis; the preparation and maintenance of a current crisis alert contact list; sources of legal and expert advice, and; the responsibility for internal communications and communicating with authorities, external organizations and media.	Compliant	
2.1.6.3	The business continuity plan shall be reviewed, tested and verified at least annually.	Compliant	
2.1.6.4	Records of reviews and verification of the business continuity plan shall be maintained.	Compliant	

2.1.6 Business Continuity Planning Summary

The supplier's written Business Continuity Plan is found in Crisis Management Action Program, dated: 10-3-17. The plan has been implemented and addresses known threats to the interruption of the business. A senior manager, the Owner has oversight of the plan and a crisis management team has been identified and trained. The Plan includes responses to an extended business interruption, isolating and identifying affected product and a current crisis alert list. The crisis plan includes internal/external communications and sources of legal and expert advice. A test of the plan was conducted on 10-2-17 involving a test scenario of a disgruntled employee claiming to have contaminated the inks on his printing press prior to being

sent home after a conflict with a co-worker. Records are maintained in Quality, including follow-up corrective actions of this review and annual test of the Crisis Management Program.

2.2.1 Document Control

Element	Description	Primary Response	Evidence
2.2.1.1	The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.	Compliant	
2.2.1.2	A register of current SQF System documents and amendments to documents shall be maintained.	Compliant	
2.2.1.3	Documents shall be safely stored and readily accessible.	Compliant	

2.2.1 Document Control Summary

The supplier has written and implemented a policy Document Control & Record Keeping Policy, dated: 3-17-16 defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. A current list of all SQF documents is maintained and documents were observed to be stored securely and are accessible. The register of SQF documents is entitled Index for Food Safety and Quality Manual and is maintained both manually and electronically.

2.2.2 Records (M)

Element	Description	Primary Response	Evidence
2.2.2.1	The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.	Compliant	
2.2.2.2	All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.	Compliant	
2.2.2.3	Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by a customer or regulations.	Compliant	

2.2.2 Records (M) Summary

The supplier has written and implemented a policy for verifying and retaining records in the document called Document Control & Record Keeping Policy, dated: 3-17-16. The supplier has documented procedures for recording production and quality monitoring as well as the proper correcting and initialing of errors. These are based on customer, company and regulatory requirements. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage and have documented retention times. Records are retained for a minimum of two years in the source department.

2.3.1 Product Development and Realization

Element	Description	Primary Response	Evidence
2.3.1.1	The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented.	Compliant	
2.3.1.2	Product formulation, manufacturing processes and the fulfillment of product requirements shall be validated by facility trials, shelf life trials and product testing.	Compliant	
2.3.1.3	Shelf life trials where necessary shall be conducted to establish and validate a product's handling, storage requirements, including the establishment of "use by" or "best before" dates, microbiological criteria, consumer preparation, storage and handling requirements.	Compliant	
2.3.1.4	A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food safety.	Compliant	
2.3.1.5	Records of all product design, process development, shelf life trials and approvals shall be maintained.	Compliant	

2.3.1 Product Development and Realization Summary

A policy defining the methods and responsibilities for commercialization of new products, entitled New Packaging Approval Process, dated: 6-13-11 has been documented and implemented. Procedures conducted at the facility include checking formulations and processes with production trials, shelf-life trials and product testing. Shelf-life trials are conducted to establish "best by" dates, handling & storage requirements and microbiological criteria. The food safety plan are validated and verified for each new product and process by the SQF Practitioner. This review includes changes to distribution and ingredients. The facility maintains records of all steps of the product development cycle including process development, shelf-life trials and facility trials. The records for development of new product (99051065) was reviewed and found to contain dimensions, raw materials and coatings, graphics, packaging information, die cut pattern and specifications.

2.3.2 Raw and Packaging Materials

Element	Description	Primary Response	Evidence
2.3.2.1	Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, hazardous chemicals and processing aids that impact on finished product safety shall be documented and kept current.	Compliant	
2.3.2.2	All raw and packaging materials and ingredients shall comply with the relevant legislation.	Compliant	
2.3.2.3	The methods and responsibility for developing and approving detailed raw material, ingredient, and packaging specifications shall be documented.	Compliant	

2.3.2.4	Raw and packaging materials and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. Validation of raw materials and ingredients shall include certificate of conformance; or certificate of analysis; or sampling and testing.	Compliant	
2.3.2.5	Validation of packaging materials shall include certification that all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.	Compliant	
2.3.2.6	Product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel.	Compliant	
2.3.2.7	A register of raw and packaging material specifications and labels shall be maintained and kept current.	Compliant	

2.3.2 Raw and Packaging Materials Summary

Specifications for raw materials, packaging, ingredients, additives, chemicals and processing aids have been documented. There are current registers in place for raw materials, packaging materials and labels. Specification for paper, inks, varnishes and solvents were reviewed and found to be current. A policy defining the methods and responsibilities for developing and maintaining specifications has been documented and implemented in the Approved Supplier Program procedure, dated: 12-5-17. Raw and packaging materials are validated to ensure product safety, regulatory requirements and quality are met by means of testing of the materials, the receipt of Letters of Guarantee, Certificates of Compliance and/or Certificates of Analysis. Food contact packaging is validated to not present chemical migration by Letters of Conformance. Product labels are approved by the SQF Practitioner, who is qualified to insure sure they are accurate and meet regulatory requirements.

2.3.3 Contract Service Providers

Element	Description	Primary Response	Evidence
2.3.3.1	Specifications for contract services that have an impact on finished product safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel.	Compliant	
2.3.3.2	A register of all contract service specifications shall be maintained.	Compliant	

2.3.3 Contract Service Providers Summary

Descriptions of services provided by all contract service providers having an impact on food safety are documented in the Contract Services Contact Information procedure, dated: 12-5-17. A list of current contract service providers is maintained in the Contract Service Providers Register and found to include providers of services including uniforms, vending, pest control, waste handling, calibration and dock door repair. Contract arrangements for pest control and calibration were reviewed during the audit and found to be satisfactory.

2.3.4 Contract Manufacturers

Element	Description	Primary Response	Evidence
2.3.4.1	The methods and responsibility for ensuring all agreements relating food safety, customers product requirements and its realization and delivery are specified and agreed shall be documented and implemented.	N/A	N/A The supplier does not use contract manufacturers.
2.3.4.2	The supplier shall verify compliance with the SQF Code and that all customer requirements are being met at all times. Products and/or processes of co-manufactures that are considred high risk shall be required to under go an audit by the supplier or other third party agency to confirm compliance to the SQF code and agreed arrangements; and ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.	N/A	N/A The supplier does not use contract manufacturers.
2.3.4.3	Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.	N/A	N/A The supplier does not use contract manufacturers.

2.3.4 Contract Manufacturers Summary

N/A The supplier does not use contract manufacturers.

2.3.5 Finished Product

Element	Description	Primary Response	Evidence
2.3.5.1	Finished product specifications shall be documented, current, approved by the supplier and their customer, accessible to relevant staff and may include microbiological and chemical limits, and labeling and packaging requirements.	Compliant	
2.3.5.2	A register of finished product specifications shall be maintained.	Compliant	

2.3.5 Finished Product Summary

Finished product specifications are current, documented and approved by the supplier's customers. Specifications include microbiological and chemical limits, labeling and packaging requirements. A register of all current finished product specifications is maintained electronically. Finished product specifications for 2 products were reviewed during the audit and found to be complete.

2.4.1 Food Legislation (Regulation) (M)

Element	Description	Primary Response	Evidence
2.4.1.1	The organization shall ensure that, at the time of delivery to its customer, the food supplied shall comply with the legislation that applies to the food and its production in the country of its origin and destination. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, nutritional, allergen and additive labeling, and to relevant established industry codes of practice.	Compliant	
2.4.1.2	The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments and relevant industry codes of practice shall be documented and implemented.	Compliant	
2.4.1.3	SQFI and the certification body shall be notified in writing within 24 hours upon identification of a food safety event that requires public notification (e.g. receipt of a regulatory warning letter).	Compliant	

2.4.1 Food Legislation (Regulation) (M) Summary

The supplier has ensured that product delivered to their customers complies with regulatory requirements. Regulatory compliance for this operation includes food packaging safety requirements. The supplier keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means a member of trade association, web sites, FDA. The supplier has documented that the certification body and SQF will be notified within 24 hours if a food safety event requiring public notification occurs.

2.4.2 Food Safety Fundamentals (M)

Element	Description	Primary Response	Evidence
2.4.2.1	The property, buildings and equipment shall be located, constructed, designed and maintained to facilitate the hygienic production, manufacture, handling, storage and/or delivery of safe food.	Compliant	
2.4.2.2	The supplier shall ensure the food safety fundamentals described in the relevant subsequent modules of this Code (i.e. modules 3 – 15) are applied or exempted according to a detailed risk analysis outlining the justification for exclusion or evidence of the effectiveness of alternative control measures to ensure that food safety and quality are not compromised.	Compliant	
2.4.2.3	Those pre-requisite programs applicable to the scope of certification that outline the means by which food safety is controlled and assured shall be documented and implemented.	Compliant	
2.4.2.4	The effectiveness of the pre-requisite programs shall be verified as described in 2.5.4.	Compliant	

2.4.2 Food Safety Fundamentals (M) Summary
The property, buildings and equipment are located, constructed and designed to ensure food is manufactured in a safe, hygienic environment. The supplier has written and implemented those food safety fundamentals applicable to the scope of this certification. These food safety pre-requisite programs are found in the Food Safety and Quality Manual, dated: 12-5-17. The effectiveness of the pre-requisite programs has been verified based on a schedule, which is found in the SQF Prerequisite Program Validation and Verification procedure, dated: 5-12-16.

2.4.3 Food Safety Plan (M)

Element	Description	Primary Response	Evidence
2.4.3.1	A food safety plan shall be developed, effectively implemented, and maintained and outline the means by which the organization controls and assures food safety. The food safety plan shall: i. Be prepared in accordance with the steps identified in the Codex Alimentarius Commission or NACMCF HACCP guidelines. Primary producers and feed manufacturers may utilize a HACCP-based reference food safety plan developed by a responsible authority. ii. Cover a product or product group and the associated processes. iii. Describe the methodology and results of a hazard analysis conducted to identify food safety hazards associated with all inputs and process steps including rework. Animal feed and pet food safety plans must include hazards associated with animal safety as well as the safety of consumers of animal products. iv. Prescribe those measures taken to apply the controls implemented that are critical to assuring, monitoring and maintaining food safety. v. Include process controls at control points in production to monitor product safety, identify when a process is deviating from set parameters and make corrections to keep a process under control; and vi. Include documented Standard Operating Procedures (SOPs) and Work Instructions (WI) applicable to the organization's scope of certification.	Compliant	

2.4.3 Food Safety Plan (M) Summary
A Food Safety Plan has been developed, implemented and maintained by the supplier. It is kept on file electronically and maintained by the SQF Practitioner. The Food Safety Plan has been prepared in accordance with the steps identified in the Codex Alimentarius Commission or NACMCF HACCP guidelines. A Food Safety Team has been identified and trained, with documentation found in the Product Safety Manual. The Plan includes a list of all products in the scope of the certification, a complete product description, flow diagrams for each process including all steps in the process. The facility does not have any Critical Control Points (CCP's). The plan is periodically reviewed by the food safety team with the last review date on 5-10-17.

2.4.5 Incoming Goods and Services

Element	Description	Primary Response	Evidence
2.4.5.1	Raw materials, ingredients, packaging materials and services that impact on finished product safety shall be supplied by an approved supplier.	Compliant	
2.4.5.2	The receipt of raw materials, ingredients, and packaging materials received from non-approved supplier shall be acceptable in an emergency situation provided they are inspected or analyzed before use.	Compliant	
2.4.5.3	The responsibility for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.	Compliant	
2.4.5.4	The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum agreed specifications, reference to the rating of the level of risk applied to a raw material's ingredients, packaging materials and services and the approved supplier, a summary of the food safety controls implemented by the approved supplier, methods for granting approved supplier status, methods and frequency of monitoring approved suppliers, details of the certificates of conformance if required, methods and frequency of reviewing approved supplier performance and status.	Compliant	
2.4.5.5	A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.	Compliant	

2.4.5 Incoming Goods and Services Summary

The facility has a written supplier approval policy Approved Supplier program, dated: 12-5-17 which has been implemented and covers the procedures for approving suppliers of raw materials, ingredients, packaging materials and services. The policy includes specifications, the level of risk to the facility, how approved supplier status is granted, requirements for Certificates of Analysis, etc. Also included are methods to review the approved supplier performance and status. The emergency use of non-approved suppliers has been documented. A register is maintained of all current approved suppliers, which was reviewed during the audit and found to be complete. Raw materials paper, inks, varnishes and solvents found in the storage warehouse were verified to have come from suppliers on the Approved Supplier List. Audits were on file for approved suppliers of paper, inks, varnishes and solvents.

2.4.6 Non-conforming Product or Equipment

Element	Description	Primary Response	Evidence
2.4.6.1	The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery is handled shall be documented and implemented. The methods applied shall ensure: Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and Non-conforming equipment is effectively	Compliant	

	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; All relevant staff is aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status. For producers, the procedure must document the grower, field name, quantity and final disposition of the unacceptable materials when applicable.		
2.4.6.2	Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.	Compliant	

2.4.6 Non-conforming Product or Equipment Summary

The supplier has written methods and responsibilities for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in document Hold and Release Procedures, dated: 3-22-16 which was found to be properly implemented in the facility. Methods to segregate, identify, handle and dispose of product have been identified to minimize any inadvertent use. Nonconforming products or equipment is identified, segregated or disposed of, with records maintained by the Quality Department. This was observed during the audit by a review of the 2017 Hold Log. Relevant staff is aware of the supplier's Hold policy, as evidenced by interviews with 2 production employees.

2.4.7 Product Rework

Element	Description	Primary Response	Evidence
2.4.7.1	The responsibility and methods outlining how the product is reworked (recycled or recouped) shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.6; and v. Release of reworked product shall conform to element 2.4.8.	Compliant	
2.4.7.2	Records of all reworking operations shall be maintained.	Compliant	

2.4.7 Product Rework Summary

A policy defining the methods and responsibilities for reworking/sorting product is documented and implemented. Reworked product is clearly identified, traceable, inspected and analyzed before release. Rework operations are supervised by qualified personnel. Records are maintained of all reworked product. These records were reviewed during the audit for material reworked on production order 31154.

2.4.8 Product Release (M)

Element	Description	Primary Response	Evidence
2.4.8.1	The responsibility and methods for releasing products shall be documented and	Compliant	

	implemented. The methods applied shall ensure the product is released by authorized personnel; and once all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.		
2.4.8.2	Records of all product release shall be maintained.	Compliant	

2.4.8 Product Release (M) Summary

The supplier has a written procedure Quality Inspection Procedure, dated: 5-3-16 implemented for releasing finished products. This includes ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety and quality controls have been met. A review of records for product releases for production orders 23366818 and 22990246 were conducted during the audit, and found to be complete.

2.4.9 Stock Rotation

Element	Description	Primary Response	Evidence
2.4.9.1	The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.	Compliant	
2.4.9.2	Procedures are in place to ensure that all ingredients, materials, work-in-progress, and finished product are utilized within their designated shelf-life.	Compliant	

2.4.9 Stock Rotation Summary

The supplier has a written policy, found in document Packaging Rotation Policy, dated: 4-19-16 defining the procedures for stock rotation. These procedures ensure that ingredients, packaging and work-in-progress are used within the defined shelf-life. Through observation during the plant tours, and interviews with Warehouse employees this inventory rotation program was found to be properly implemented.

2.5.1 Responsibility, Frequency and Methods

Element	Description	Primary Response	Evidence
2.5.1.1	Validation and verification activities shall be conducted.	Compliant	
2.5.1.2	The frequency and methods used to validate and verify food safety fundamentals, critical limits, and other food safety controls identified in food safety plans shall be documented and implemented and meet their intended purpose.	Compliant	
2.5.1.3	Records of all verification activities shall be maintained.	Compliant	

2.5.1 Responsibility, Frequency and Methods Summary

A schedule for validation and verification activities has been established. This schedule is found in the SQF Prerequisite Program Validation and Verification Procedure, dated: 5-12-16. The SQF Practitioner is responsible for validating and verifying food safety fundamentals and critical limits. Records of these activities are maintained and were reviewed for production orders 23366818 and 22990246 during the audit, and found to be complete.

2.5.2 Validation & Effectiveness (M)

Element	Description	Primary Response	Evidence
2.5.2.1	The methods, responsibility and criteria for ensuring the effectiveness of pre-requisite programs, and validating critical food safety limits to ensure they achieve their intended purpose shall be documented and implemented. The methods applied shall ensure that pre-requisite programs are confirmed to ensure they achieve the required result, that critical limits are selected to achieve the designated level of control of the identified food safety hazard(s), all critical limits and control measures individually or in combination effectively provide the level of control required, all critical limits and control measures individually or in combination effectively provide the level of control required, changes to the processes or procedures are assessed to ensure controls are still effective, ensure that critical food safety limits are re-validated at least annually.	Compliant	
2.5.2.2	Records of all validation activities shall be maintained.	Compliant	

2.5.2 Validation & Effectiveness (M) Summary

The methods, responsibilities and criteria for verifying the effectiveness of pre-requisite programs and validating critical control limits have been documented and implemented. These are found in the SQF Prerequisite Program Validation and Verification procedure, dated: 5-12-16. Records of all verification of effectiveness and validation activities are maintained by the SQF Practitioner and were found to be complete.

2.5.3 Verification Schedule

Element	Description	Primary Response	Evidence
2.5.3.1	A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.	Compliant	

2.5.3 Verification Schedule Summary

The supplier has established a verification schedule outlining the verification activities, methods and responsibilities for each activity. The schedule is maintained electronically and maintained by the SQF Practitioner.

2.5.4 Verification of Monitoring Activities (M)

Element	Description	Primary Response	Evidence
2.5.4.1	The methods, responsibility and criteria for verifying the effectiveness of monitoring pre-requisite programs critical control points and other food safety controls identified shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record verified.	Compliant	
2.5.4.2	Records of the verification of monitoring activities shall be maintained.	Compliant	

2.5.4 Verification of Monitoring Activities (M) Summary

The supplier has defined the methods, responsibilities and criteria for verifying the effectiveness of monitoring pre-requisite programs and critical control points. The responsible person for this is the SQF Practitioner, who verifies each record and maintains the records of these activities.

2.5.5 Corrective and Preventative Action (M)

Element	Description	Primary Response	Evidence
2.5.5.1	The responsibility and methods outlining how corrections and corrective actions are investigated, resolved, managed and controlled, including the identification of the root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements, shall be documented and implemented.	Compliant	
2.5.5.2	Records of all investigation and resolution of corrections and corrective action shall be maintained.	Compliant	

2.5.5 Corrective and Preventative Action (M) Summary

The supplier's Corrective and Preventative Action program is written in Corrective and Preventive Action Procedure. It describes the methods and responsibilities for investigating, resolving and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Records of investigations and corrective actions were reviewed during the audit for 2017 customer complaints 2017-1, 2017-2, 2017-3, 2017-4, 2017-5. These were found to have proper reviews, investigations, corrective and preventative actions and resolutions documented.

2.5.6 Product Sampling, Inspection and Analysis

Element	Description	Primary Response	Evidence
2.5.6.1	The methods, responsibility and criteria for sampling, inspecting and/or analyzing	Compliant	

	raw materials, finished product and work in progress shall be documented and implemented. The methods applied shall ensure: Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements; Inspections are conducted to ensure raw materials, work in process and finished products comply with the relevant specification, regulatory requirements and are true to label; and All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard.		
2.5.6.2	Records of all inspections and analyses shall be maintained.	Compliant	
2.5.6 Product Sampling, Inspection and Analysis Summary			
The supplier's procedures and criteria for sampling, inspecting and analyzing raw materials, work-in-progress and finished product have been documented and implemented in Quality Inspection procedure, dated: 5-3-16. Inspections and analyses are scheduled at regular intervals to agreed specifications, regulatory requirements and true to label weight requirements. Requirements of Certificates of Analysis are required for film. All analyses are conducted to nationally recognized methods by the packaging industry. External laboratories utilized are accredited to ISO 17025 or equivalent standards. Product evaluation and testing records were reviewed for production orders 23366818 and 22990246 during the audit and found to be complete.			

2.5.7 Internal Audits (M)

Element	Description	Primary Response	Evidence
2.5.7.1	The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System including facility and equipment inspections, pre-requisite programs, food safety plans and legislative controls shall be documented and implemented. The methods applied shall ensure an internal audit schedule is prepared detailing the scope and frequency of internal audits, ensure correction and corrective action of deficiencies identified during the internal audits are undertaken, audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions; and records of internal audits and any corrections and corrective action taken as a result of internal audits shall be maintained.	Compliant	
2.5.7.2	Staff conducting internal audits shall be trained in internal audit procedures.	Compliant	
2.5.7.3	Where possible staff conducting internal audits shall be independent of the function being audited.	Compliant	
2.5.7 Internal Audits (M) Summary			

The facility's procedure for scheduling and conducting internal audits so the effectiveness of the SQF system is verified has been documented and implemented in the document Corporate Internal Audit Program, dated: 1-3-17. The Internal Audit Program is maintained by the Quality Department and internal audits are conducted by a contracted internal auditing service. Facility and equipment inspections, internal audits of the food safety plan and regulatory inspections are part of the internal audit programs. The frequency of the audits are communicated to management; the SQF Practitioner is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and audit areas independent of their function. Records of internal audits in the facility conducted 5-24-17 were reviewed during the audit and found to be complete.

2.6.1 Product Identification (M)

Element	Description	Primary Response	Evidence
2.6.1.1	The methods and responsibility for identifying products during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure raw materials, work in progress and finished product are clearly identified during all stages of receipt, production, storage and dispatch, and finished product is labeled to the customer specification and/or regulatory requirements.	Compliant	
2.6.1.2	Product identification records shall be maintained.	Compliant	

2.6.1 Product Identification (M) Summary

A policy defining how products are identified from receipt through production and shipping has been documented in the Traceability: Packaging & Packaging Components procedure, dated: 4-19-16. The supplier's identification system ensures all materials, work-in-progress and finished goods are clearly identified at all stages of their process. Items are marked at receipt by component lot numbers. Product identification records were reviewed during the audit for paper, inks, varnishes and solvents demonstrated the products were properly identified throughout the process.

2.6.2 Product Trace (M)

Element	Description	Primary Response	Evidence
2.6.2.1	The responsibility and methods used to trace product shall be documented and implemented to ensure finished product is traceable to the customer (one up) and provides traceability through the process to the supplier and date of receipt of raw materials, food contact packaging and materials and other inputs (one back); traceability is maintained where product is reworked; and the effectiveness of the product trace system shall be tested at least annually.	Compliant	
2.6.2.2	Records of raw and packaging material receipt and use, and product dispatch and destination shall be maintained.	Compliant	

2.6.2 Product Trace (M) Summary

A policy defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back). This is written in the Traceability: Packaging & Packaging Components procedure, dated: 4-19-16. Any rework is identified to ensure traceability and the effectiveness of the trace system is conducted twice a year. Records of the receipt, use and dispatch of product are maintained.

2.6.3 Product Withdrawal and Recall (M)

Element	Description	Primary Response	Evidence
2.6.3.1	The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall identify those responsible for initiating, managing and investigating a product withdrawal or recall; describe the management procedures to be implemented including sources of legal and expert advice; and outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident. SQFI and the certification body shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any reason.	Compliant	
2.6.3.2	Investigation shall be undertaken to determine the root cause of a withdrawal or recall and details of investigations and any action taken shall be documented.	Compliant	
2.6.3.3	The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually.	Compliant	
2.6.3.4	Records of all product withdrawals, recalls and mock recalls shall be maintained.	Compliant	

2.6.3 Product Withdrawal and Recall (M) Summary

A policy defines the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and is led by the SQF Practitioner. Contact information for NSF and SQFI has been documented and is correct. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. Mock trace exercises are completed annually, one step forward and one step back, to verify the effectiveness of the system. Records are maintained of the review of the recall plan and summaries of the trace exercises performed by the plant. The records for mock recalls and trace exercises conducted 3-21-17 and 10-31-17 showed compliance with the supplier's Product Withdrawal/Recall Action Program, dated: 12-5-17.

2.7.1 Food Defense (M)

Element	Description	Primary Response	Evidence
2.7.1.1	The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident shall be documented, implemented and maintained.	Compliant	

2.7.1.2	A food defense protocol shall be prepared and include: The name of the senior management person responsible for food defense; The methods implemented to ensure only authorized personnel have access to crops, production equipment and vehicles, manufacturing and storage areas through designated access points; The methods implemented to protect sensitive processing points from intentional adulteration; The measures taken to ensure the secure storage of raw materials, packaging, equipment and hazardous chemicals; The measures implemented to ensure harvested crop and/or finished product is held under secure storage and transportation conditions; and The methods implemented to record and control access to the premises by employees, contractors, and visitors.	Compliant	

2.7.1 Food Defense (M) Summary

The supplier has a Defense Security Program procedure, dated: 6-1-17 in which the methods, responsibilities and criteria for preventing food adulteration and has been documented and implemented. A food defense protocol includes the name of the senior management responsible for food defense (Plant Manager), the access of only authorized personnel, designated access points, the secured storage of materials and hazardous chemicals and the control of access to contractors and visitors. A current food defense/site security assessment was completed 6-1-17.

2.8.2 Allergen Management

Element	Description	Primary Response	Evidence
2.8.2.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include a risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain allergens; a register of allergens which is applicable in the country of manufacture and the country(ies) of destination; a list of allergens which is accessible by relevant staff; the hazard associated with allergens and their control incorporated into food safety plan; instructions on how to identify, handle store and segregate raw materials containing allergens provided to staff responsible for receiving those target raw materials; provision to clearly identify and segregate foods that contain allergens; cleaning and sanitation of product contract surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential allergens from product contact surfaces, including aerosols as appropriate, to prevent cross contact; based on risk assessment, procedures for verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented; separate handling and production equipment where satisfactory line hygiene and clean-up or	N/A	N/A The facility does not use allergens in the production process.

	segregation is not possible.		
2.8.2.2	The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured.	N/A	N/A The facility does not use allergens in the production process.
2.8.2.3	The product trace system shall take into consideration the conditions under which allergen containing foods are manufactured and ensure full trace back of all ingredients used.	N/A	N/A The facility does not use allergens in the production process.
2.8.2.4	Re-working of product containing allergen causing agents shall be conducted under conditions that ensure product safety and integrity is maintained. Re-worked product containing allergens shall be clearly identified and traceable.	N/A	N/A The facility does not use allergens in the production process.

2.8.2 Allergen Management Summary

N/A The facility does not use allergens in the production process.

2.9.1 Training Requirements

Element	Description	Primary Response	Evidence
2.9.1.1	Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF level 2 system and the maintenance of food safety and regulatory requirements.	Minor	Senior Management Team training records were not available for the following procedures: Crisis Management Action Program, Defense Security Program and Product Withdrawal / Recall Action Program.

2.9.1 Training Requirements Summary

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. This was evidenced in the facility by interviews with 2 plant employees. Minor: Senior Management Team training records were not available for the following procedures: Crisis Management Action Program, Defense Security Program and Product Withdrawal / Recall Action Program.

2.9.2 Training Program (M)

Element	Description	Primary Response	Evidence
2.9.2.1	An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: Developing and applying Good Agricultural Practices, Good Aquaculture Practices, or Good	Compliant	

	Manufacturing Practices (as appropriate); applying food regulatory requirements; steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.		

2.9.2 Training Program (M) Summary

The supplier has documented and implemented a Training Program procedure, dated: 4-19-16 that outlines the necessary competencies for all plant personnel to ensure regulatory, food safety, food quality and all other requirements critical to the maintenance of the SQF System are met. This training program is administered by the SQF Practitioner.

2.9.3 Instructions

Element	Description	Primary Response	Evidence
2.9.3.1	Instructions shall be available explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety and process efficiency are to be performed.	Compliant	

2.9.3 Instructions Summary

Work instructions have been written explaining how tasks critical to maintaining food safety are performed. Records of work instruction training were reviewed for 5 employees.

2.9.4 HACCP Training Requirement

Element	Description	Primary Response	Evidence
2.9.4.1	HACCP training shall be provided for staff involved in developing and maintaining food safety plans.	Compliant	

2.9.4 HACCP Training Requirement Summary

HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The last training occurred 5-10-17.

2.9.5 Language

Element	Description	Primary Response	Evidence
2.9.5.1	Training materials and the delivery of training shall be provided in language	Compliant	

	understood by staff.		

2.9.5 Language Summary

The training language and materials used are understood by all plant personnel.

2.9.6 Refresher Training

Element	Description	Primary Response	Evidence
2.9.6.1	The training program shall include provision for identifying and implementing the refresher training needs of the organization.	Compliant	

2.9.6 Refresher Training Summary

Periodic refresher training needs have been identified and the proper refresher training has been conducted for all personnel to ensure food safety, quality and the SQF system are maintained.

2.9.7 Training Skills Register

Element	Description	Primary Response	Evidence
2.9.7.1	A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the participant name, skills description, description of the training provided, date training completed, the trainer or training provider, and the supervisor's verification the training was completed and that the trainee is competent to complete the required tasks.	Compliant	

2.9.7 Training Skills Register Summary

A training skills register is maintained by Human Resources and includes a listing of the trainee, trainer, the description of the training, the date of training and verification by supervision that the training was completed. The supplier verifies the effectiveness of training by documented testing. Plant employees (5) were found to have current training records on the register.

13.1.1 Premises Location

Element	Description	Primary Response	Evidence
13.1.1.1	The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.	Compliant	

13.1.1 Premises Location Summary

The supplier's buildings, property and surroundings do not pose a risk to food safety. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program. The last external inspection was performed in , 2016 and reviewed by management.

13.1.2 Construction and Operational Approval

Element	Description	Primary Response	Evidence
13.1.2.1	The construction and on-going operation of the premises on the site shall be approved by the relevant authority.	Compliant	

13.1.2 Construction and Operational Approval Summary

The supplier maintains the required approvals by relevant authorities, as evidenced by a current permit issued by the State of Ohio Environmental Protection Agency for their ongoing operations.

13.2.1 Materials and Surfaces

Element	Description	Primary Response	Evidence
13.2.1.1	In facilities where food contact packaging is manufactured, product contact surfaces shall be constructed of materials that will not contribute a food safety risk.	Compliant	

13.2.1 Materials and Surfaces Summary

Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials including stainless steel. They were observed during the audit to be properly maintained so that food safety is not compromised.

13.2.2 Floors, Drains and Waste Traps

Element	Description	Primary Response	Evidence
13.2.2.1	Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.	Compliant	
13.2.2.2	Drains shall be constructed and located so they can be easily cleaned and not present a hazard.	Compliant	
13.2.2.3	Wate trap system shall be located away from any food packaging and material handling area or entance to the premises in order to prevent contamintaion.	Compliant	

13.2.2 Floors, Drains and Waste Traps Summary

Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage of overflow or waste water. Waste traps systems are located near the plate mounting department, which is away from food handling areas. Waste water during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection.

13.2.3 Walls, Partitions, Doors and Ceilings

Element	Description	Primary Response	Evidence
13.2.3.1	Walls, partitions, ceilings and doors shall be of durable construction and fit for purpose.	Compliant	
13.2.3.2	Wall to wall and wall to floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.	Compliant	
13.2.3.3	Doors shall be of solid construction and windows shall be made of shatterproof glass or similar material.	Compliant	

13.2.3 Walls, Partitions, Doors and Ceilings Summary

Walls, ceilings and doors are of durable construction with smooth and light colored surfaces and were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be installed for ease of cleaning. Overhead cleaning was found to be part of the master cleaning schedule. Doors, windows and frames were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of insulated freezer panels which are easily cleaned and prevent product contamination.

13.2.4 Lighting and Light Fittings

Element	Description	Primary Response	Evidence
13.2.4.1	Lighting in premises where food contact packaging is manufactured shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.	Compliant	
13.2.4.2	Light fittings in such areas shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling.	Compliant	
13.2.4.3	Light fittings in other areas where product is stored shall be designed such as to prevent breakage and product contamination.	Compliant	

13.2.4 Lighting and Light Fittings Summary

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof. There is a glass and brittle plastic register for each area of the facility. Periodic audits are completed for each area and all lighting in warehouses is protected and included in the glass and brittle plastic inspections. The most recent glass and brittle plastic inspection was conducted in November, 2016 by the SQF Practitioner.

13.2.5 Dust, Fly and Vermin Proofing			
Element	**Description**	**Primary Response**	**Evidence**
13.2.5.1	All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and flies.	Compliant	
13.2.5.2	Personnel access doors shall be provided. They shall be effectively fly-proofed and fitted with a self-closing device.	Compliant	
13.2.5.3	External doors, including overhead dock doors, used for product, pedestrian or truck access shall be fly-proofed.	Compliant	
13.2.5.4	Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to packaging, or manufacturing equipment.	Compliant	
13.2.5 Dust, Fly and Vermin Proofing Summary			
Windows, doors and other openings are sealed to prevent any pest infestation or dust coming into the facility. Personnel access doors are self-closing and sealed to prevent any pest infestation. External doors and dock doors were sealed to prevent infestation. Electric insect devices, interior and exterior rodent stations are located so product is not at risk for contamination. Bait is only used on the outside of the facility.			

13.2.6 Ventilation			
Element	**Description**	**Primary Response**	**Evidence**
13.2.6.1	Adequate ventilation shall be provided in areas where food contact packaging is manufactured and stored.	Compliant	
13.2.6 Ventilation Summary			
Adequate ventilation was observed above cookers, hot fillers and other heating operation to prevent condensation. Air ventilation and heat extraction were observed to be adequate above processing areas with heating operations and no condensation was noted.			

13.2.7 Premises and Equipment Maintenance			
Element	**Description**	**Primary Response**	**Evidence**
13.2.7.1	The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented planned and carried out in a manner that minimizes the risk of product, packaging or equipment contamination.	Compliant	

13.2.7.2	Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any handling or storage area: routine maintenance of plant and equipment shall be performed according to a maintenance-control schedule and recorded, failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule, compliance with the personnel and process hygiene requirements (refer to elements 13.3.1, 13.3.2, 13.3.3, 13.3.4) by maintenance staff and contractors, ensure area supervisors are notified when maintenance or repairs are to be undertaken in any packaging manufacturing area. inform the maintenance supervisor and the facility supervisor if any repairs or maintenance that pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times. remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of facility operations.	Minor	Quarterly Press point of use filter change records were not available for the second quarter of 2017.
13.2.7.3	The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance if product safety and quality.	Compliant	
13.2.7.4	Equipment located over product or product conveyors shall be lubricated with food grade lubricants and their use controlled so as to minimize the contamination of the product. Machinery lubricant controls shall be in place to prevent contamination of packaging materials from gear box oils, bearing lubricants, hydraulics, or any other source.	Compliant	
13.2.7.5	Paint used in a production area shall be suitable for use and in good condition and shall not be used on any product contact surface.	Minor	Flaking paint was observed near the product path on Press#6.

13.2.7 Premises and Equipment Maintenance Summary

A policy defines the methods and responsibilities for the maintenance and repair of all plant equipment and buildings. There is a schedule of planned Preventive Maintenance and tasks are documented in Preventive Maintenance Procedure. When repairs and maintenance work are completed, personnel document accounting of tools and cleanliness of the work areas. This documentation found on file in the Maintenance Department was reviewed during the audit and found to be complete. Maintenance personnel are trained in good manufacturing practices and food safety. Periodic inspections are completed to ensure loose parts and other materials are not potential contaminants. Machinery, conveyers and other equipment over or near food or food contact surfaces are lubricated with food grade materials. The food grade lubricants were noted to be stored separately and labeled properly in locked storage areas. Paint is not used on food contact surfaces and any paint in processing areas was noted to be in good condition with no flaking noted. Minor: 1. Quarterly Press point of use filter change records were not available for the second quarter of 2017. 2. Flaking paint was observed near the product path on Press#6.

13.2.8 Calibration

Element	Description	Primary Response	Evidence
13.2.8.1	The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in the pre-requisite program, food safety plans and food quality plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented.	Compliant	
13.2.8.2	Procedures shall be documented and implemented to address the disposition of potentially affected Product should measuring, test and inspection equipment be found to be out of calibration state.	Compliant	
13.2.8.3	Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.	Compliant	
13.2.8.4	Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available the supplier shall provide evidence to support the calibration reference method applied.	Compliant	
13.2.8.5	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.	Compliant	
13.2.8.6	Calibration records shall be maintained.	Compliant	

13.2.8 Calibration Summary

A policy defines the methods and responsibilities for calibrating measuring, testing and inspection equipment and has been implemented. The facility has developed a calibration schedule with all devices listed. This documentation is maintained by the Quality Department. The frequency of inspections based on the manufacturer's recommendations or customer requirements. A review of the calibration records for Scales , Micrometers, Rub Testers and Bar Code Readers confirm the schedule is being followed. The policy includes the procedures to address the disposition of any affected product should inspection equipment be found to be out of calibration, written in Out of Calibration / Calibration Inspection procedure. Inspection and testing equipment is protected from damage or unauthorized use by control of equipment location. Equipment is calibrated against national or international standards.

13.2.9 Management of Pests and Vermin

Element	Description	Primary Response	Evidence
13.2.9.1	The methods and responsibility for integrated pest management shall be documented and effectively implemented. The premises, its surrounds, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.	Compliant	
13.2.9.2	The pest and vermin management program shall describe the methods and responsibility for the development, implementation and maintenance of the pest and vermin management program, identify the target pests for each pesticide	Compliant	

	application, outline the methods used to prevent pest problems, outline the pest elimination methods, outline the frequency with which pest status is to be checked, include on a site map the identification, location, number and type of bait stations set, list the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available). outline the methods used to make staff aware of the bait control program and the measures to take when they come in contact with a bait station. outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits. measure the effectiveness of the program to verify the elimination of applicable pests.		
13.2.9.3	Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.	Compliant	
13.2.9.4	Records of all pest control applications shall be maintained.	Compliant	
13.2.9.5	Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 13.6.3 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food contact packaging.	Compliant	
13.2.9.6	Pest control contractors shall be licensed and approved by the local relevant authority, use only trained and qualified operators who comply with regulatory requirements, use only approved chemicals, provide a pest control management plan (see Contract Services 2.3.3) which will include a site map indicating the location of bait stations and traps, report to a responsible senior management person on entering the premises and after the completion of inspections or treatments, provide a written report of their findings and the inspections and treatments applied.	Compliant	
13.2.9.7	The supplier shall dispose of unused pest control chemicals and empty containers in accordance with regulatory requirements and ensure that empty chemical containers are not reused; empty containers are labeled, isolated and securely stored while awaiting collection; and unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.	Compliant	

13.2.9 Management of Pests and Vermin Summary

A policy defines the methods and responsibilities for integrated pest management and has been effectively implemented. The premises was free of waste and debris as observed during the interior and exterior tours. A Pest Control Operator has been contracted for pest management and an updated scope of service dated 1-4-17 defines the methods of pest control, frequency of interior and exterior inspections and targeted pests. A current site map, dated 1-4-16 is accurate showing the location of 15 external, 35 internal devices and 7 insect light traps. A pesticide application log gives details and dates of all chemical usage. Licenses of the Pest Control Operator expiration date 9-30-18 from local authorities are current and indicate employees are trained and competent. A list of chemicals used by the Pest Control Operator is found in approved chemical list and includes SDS information. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues highlighted by the Pest Control Operator

are addressed and documented by the supplier.

13.2.10 Equipment, Utensils and Protective Clothing

Element	Description	Primary Response	Evidence
13.2.10.1	Equipment and utensils shall be designed, constructed, installed, operated and maintained so as not to pose a contamination threat to the product.	Compliant	
13.2.10.2	Where required, protective clothing shall be manufactured form material that is not liable to comtaminate food and can be easily cleaned.	Compliant	
13.2.10.3	Where protective clothing is used, hooks, racks or other forms of off-floor storage shall be provided for protective clothing when staff leaves the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.	Compliant	

13.2.10 Equipment, Utensils and Protective Clothing Summary

Equipment and utensils including tables, and containers are designed, constructed and installed so a there is no contamination threat to product. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. It was observed that protective clothing is made of material not likely to contaminate product. Employees store protective clothing on racks adjacent to access points when going on breaks.

13.2.11 Cleaning and Sanitation

Element	Description	Primary Response	Evidence
13.2.11.1	The methods and responsibility for the cleaning of manufacturing and storage areas, staff amenities and toilet facilities shall be documented and implemented.	Compliant	
13.2.11.2	Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.	Compliant	
13.2.11.3	Racks or other off-floor storage areas shall be designated for cleaning product containers, utensils and cleaning staffs protective clothing. Storage for cleaned utensils and protectie clothing shall be provided as required.	Compliant	
13.2.11.4	Pre-operational hygiene and sanitation inspections shall be conducted by qualified personnel to ensure manufacturing and storage areas, staff amenities and sanitary facilities and other essential areas are clean.	Compliant	
13.2.11.5	The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.	Compliant	

13.2.11.6	Detergents and sanitizers shall be purchased in accordance with applicable legislation. The organization shall ensure an inventory of all chemicals purchased and used shall be maintained, detergents and chemicals are stored as outlined in element 13.6.3, Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased, only trained staff handles sanitizers and detergents.	Compliant	
13.2.11.7	The supplier shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use, labeled, isolated and securely stored while awaiting collection, unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.	Compliant	

13.2.11 Cleaning and Sanitation Summary

The supplier has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage, cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan for dates 1-1-16 thru 11-30-16 showed tasks were completed as scheduled. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a contamination risk to food product. Sanitation tasks are documented as well as pre-operational inspections. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. Pre-operational inspections for 2 production orders were reviewed and had proper corrective actions documented as required. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Chemicals ALPET D2 and FlexoClearnSuper Concentrate were observed to have SDS on hand. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted in September, 2017.

13.3.1 Personnel

Element	Description	Primary Response	Evidence
13.3.1.1	Personnel suffering from infectious diseases or are carriers of, any infectious disease shall not engage in the manufacture of food contact packaging, or storage areas where food contact packaging is exposed.	Compliant	
13.3.1.2	Personnel with exposed cuts, sores or lesions shall not be engaged in handling packaigng materials. Minor cuts or abrasions on exposed parts of the body shall be convered with colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.	Compliant	
13.3.1.3	Smoking, chewing, eating, drinking or spitting is not permitted in any food handling or storage areas where product is produced, stored or otherwise exposed.	Compliant	

13.3.1 Personnel Summary

A Good Manufacturing Practice policy for all employees has been documented and implemented. Employees are prohibited from working in food handling areas when suffering from infectious and communicable diseases or have exposed cuts, sores or lesions. The policy requires that minor cuts or abrasions be covered with a waterproof, metal detectable and colored bandage or dressing. The GMP policy prohibits smoking, eating, drinking or spitting in the facility. Smoking is prohibited in all areas of the facility. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements.

13.3.2 Hand Washing

Element	Description	Primary Response	Evidence
13.3.2.1	Hand wash basins shall be provided adjacent to all personnel access points and in accessible locations throughout manufacturing area as required.	Compliant	
13.3.2.2	Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with a potable water supply at an appropriate temperature supplied with liquid soap contained within a fixed dispenser, supplied with paper towels or effective hand dryer, supplied with a means of containing used paper towels.	Compliant	
13.3.2.3	A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.	Compliant	
13.3.2.4	Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors on entering product contact areas, after each visit to a toilet., after using a handkerchief, after smoking, eating or drinking, after handling contaminated material.	Compliant	
13.3.2.5	When gloves are used, personnel shall maintain the hand washing practices outlined above.	Compliant	

13.3.2 Hand Washing Summary

A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hand when wearing gloves. Interviews conducted with 2 production employees during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and using proper glove use procedures.

13.3.3 Clothing

Element	Description	Primary Response	Evidence
13.3.3.1	Clothing worn by staff engaged in handling food contact packaging shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.	Compliant	

13.3.3.2	Clothing shall be clean at the commencement of each shift and maintained in a serviceable condition. Excessively soiled uniforms shall be changed where they present a product contamination risk.	Compliant	

13.3.3 Clothing Summary

A policy defining clothing requirements has been documented and implemented. Clothing including shoes are required to be clean at the commencement of the shift and changed if excessively soiled. Disposable gloves are to be changed when soiled or damaged. Employees were observed to be in compliance with the clothing requirements of the facility.

13.3.4 Jewelry and Personal Effects

Element	Description	Primary Response	Evidence
13.3.4.1	Jewelry and other loose objects shall not be worn or taken into a product handling area or any area where packaging is exposed. The wearing of plain bands with no stones and medical alert bracelets that cannot be removed can be permitted, however the supplier will need to consider their customer requirements and the applicable food legislation.	Compliant	
13.3.4.2	The wearing of plain bands with no stones and medical alert bracelets that cannot be remorved can be permitted, however the supplier will need to consider their customer requriements and the applicable food legislation.	Compliant	

13.3.4 Jewelry and Personal Effects Summary

A policy defining jewelry has been written and implemented. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to be in compliance with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy.

13.3.5 Visitors

Element	Description	Primary Response	Evidence
13.3.5.1	All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any packaging handling or storage area.	Compliant	
13.3.5.2	Visitors shall enter and exit packaging handling or storage area through the proper staff entrance points and comply with all hand washing and personal practice requirements.	Compliant	

13.3.5 Visitors Summary

A policy defining visitor and contractor requirements has been documented and implemented. Visitors are required to follow the facility rules including using proper access points, comply with hand wash requirements, use of suitable protective clothing and footwear, removal of jewelry and other loose objects and not exhibit visible signs of illness if entering food handling and processing areas.

13.3.6 Staff Amenities

Element	Description	Primary Response	Evidence
13.3.6.1	Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and storage of food contact packaging.	Compliant	

13.3.6 Staff Amenities Summary

Employee bathrooms and break rooms are appropriately lit and ventilated and available for all personnel at the facility.

13.3.7 Change Rooms

Element	Description	Primary Response	Evidence
13.3.7.1	Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.	Compliant	
13.3.7.2	Provision shall be made for staff to store their street clothing and personal items separate from packaging handling or storage areas.	Compliant	

13.3.7 Change Rooms Summary

There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas.

13.3.8 Sanitary Facilities

Element	Description	Primary Response	Evidence
13.3.8.1	Toilet rooms shall be designed and constructed so that they are accessible to staff and separate from any packaging handling or storage operations, accessed from the manufacturing area via an airlock vented to the exterior or through an adjoining room, sufficient in number for the maximum number of staff, constructed so that they can be easily cleaned and maintained and kept clean and tidy.	Compliant	
13.3.8.2	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 in order to	Compliant	

	minimize the potential for contamination.		
13.3.8.3	Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 13.3.2.3.	Compliant	

13.3.8 Sanitary Facilities Summary

Bathrooms are designed and constructed so they are separate from food processing and handling areas and accessed via a separate room or airlock. Bathrooms were observed to be sufficient in number for all employees and were found to be cleaned and maintained on a scheduled basis. Site drawings indicated that the sanitary drainage is separated from plant drainage. Bathrooms have hand wash sinks and comply with requirements in 13.3.8.

13.3.9 Lunch Rooms

Element	Description	Primary Response	Evidence
13.3.9.1	Separate lunch room facilities shall be provided away from packaging handling or storage areas. Lunch rooms shall be kept clean and tidy and free from waste materials and pests.	Compliant	
13.3.9.2	Signage in appropriate languages advising people to wash their hands before entering the food processing areas shall be provided in a prominent position in lunch rooms and at lunch room exits.	Compliant	

13.3.9 Lunch Rooms Summary

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

13.3.10 First Aid

Element	Description	Primary Response	Evidence
13.3.10.1	First aid facilities shall be provided to treat minor injuries and suitable arrangements shall be provided in circumstances when a patient requires more specialized care.	Compliant	

13.3.10 First Aid Summary

First aid kits are available for treatment of minor wounds and management makes arrangements for an employee requiring more specialized care. First aid kits were observed to be located in the following facility locations: Production Supervisors office and Administrative offices.

13.4.1 Staff Engaged in Handling of Food Contact Packaging

Element	Description	Primary Response	Evidence
13.4.1.1	All personnel engaged in any packaging handling and storage operations shall comply with the following practices: personnel entry to manufacturing areas shall be through the personnel access doors only, all doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of product/ingredient/packaging is required, packaging material shall be kept in appropriate containers as required and off the floor, waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate.	Compliant	
13.4.1.2	The manufacturing process shall be controlled such that the packaging material produced is food safe and free from contamination. Procedures shall be in place to prevent cross contamination of food contact packaging from raw materials, recycled materials, or chemicals.	Compliant	
13.4.1.3	All personnel engaged in the manufacture, storage, transport and handling of packaging materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.	Compliant	

13.4.1 Staff Engaged in Handling of Food Contact Packaging Summary

Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish is prohibited and no violations were noted. Ingredients were in appropriate, labeled containers and kept off the floor.

13.5.1 Water Supply

Element	Description	Primary Response	Evidence
13.5.1.1	Adequate supplies of clean water shall be provided for use during manufacturing operations, as an ingredient and for cleaning the premises and equipment.	Compliant	
13.5.1.2	Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.	Compliant	

13.5.1 Water Supply Summary

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from Greater Cincinnati Waterworks. A review of the 2016 water test reports indicated that the water is in compliance with the National Drinking Water Act. It was determined that there was adequate hot and cold water for cleaning and processing.

13.5.2 Monitoring Water Microbiology and Quality

Element	Description	Primary Response	Evidence
13.5.2.1	Water used for i.the manufacture of food contact packaging; ii. Cleaning product contact surfaces; iii. the manufacture of steam that will come in contact with food or used to heat water that will come in contact with food shall comply with local, national or internationally recognized potable water microbiological and quality standards as required.	N/A	N/A Water is not used in the production process.

13.5.2 Monitoring Water Microbiology and Quality Summary

N/A Water is not used in the production process.

13.5.3 Water Delivery

Element	Description	Primary Response	Evidence
13.5.3.1	The delivery of water within the premises shall ensure potable water is not contaminated.	Compliant	
13.5.3.2	The use of non-potable water shall be controlled such that there is no cross contamination between potable and non-potable water lines, non-potable water piping and outlets are clearly identified.	Compliant	

13.5.3 Water Delivery Summary

Plant schematics were reviewed and non-potable water such as fire suppression sprinkler systems is separated from the potable source. Back flow devices are installed on water lines. Back flow devices are tested annually and the last test was conducted on 12-5-17.

13.5.4 Air Quality

Element	Description	Primary Response	Evidence
13.5.4.1	Compressed air that contacts food or food contact surfaces shall be clean and present no risk to food safety	Compliant	
13.5.4.2	Compressed air systems used in the production process shall be maintained and regularly monitored for purity	Compliant	

13.5.4 Air Quality Summary

Compressed air coming in contact with food or food contact surfaces is checked periodically for cleanliness and biological purity. Filters are located at the point of use and are of the appropriate micron size to effectively filter the air before contacting food or food contact surfaces. Filter inspections and changes are on the preventive maintenance schedule.

13.6.1 Storage of Food Contact Packaging

Element	Description	Primary Response	Evidence
13.6.1.1	Rooms used for the storage of food contact packaging shall be located away from wet areas and constructed to protect the product from contamination and deterioration.	Compliant	
13.6.1.2	Equipment used for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room.	Compliant	
13.6.1.3	Vehicles used in storage rooms shall be designed and operated so as not to present a food safety hazard.	Compliant	

13.6.1 Storage of Food Contact Packaging Summary

Storage areas for raw materials, packaging and finished goods were observed to be located away from any wet areas, clean and well maintained. Product is protected from contamination and deterioration. Racking is designed and constructed from impervious materials and located so storage areas can be cleaned and inspected. Forklifts and other vehicles in processing areas and storage areas do not present a food hazard.

13.6.2 Storage of Equipment

Element	Description	Primary Response	Evidence
13.6.2.1	Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment.	Compliant	

13.6.2 Storage of Equipment Summary

Storage rooms for containers and equipment were observed to be well designed and constructed.

13.6.3 Storage of Hazardous Chemicals and Toxic Substances

Element	Description	Primary Response	Evidence
13.6.3.1	Hazardous chemicals and toxic substances with the potential for contamination of packaging materials shall be stored so as not to present a hazard to staff, packaging, or areas in which packaging is handled, stored or transported.	Compliant	

13.6.3 Storage of Hazardous Chemicals and Toxic Substances Summary

Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel and food products. No processing utensils or packaging were stored next to chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment. Daily supplies of chemicals were stored properly. All stored chemicals have current SDS information on file at the facility. SDS information was reviewed for Chemical ALPET D2 and FlexoClean Super Concentrate.

13.6.4 Alternative Storage and Handling of Goods

Element	Description	Primary Response	Evidence
13.6.4.1	Where goods described in 13.6.1 to 13.6.3 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 effect on food safety and quality.	Compliant	

13.6.4 Alternative Storage and Handling of Goods Summary

The company uses temporary storage for products described in 11.6.1 to 11.6.4 and the supplier has completed a risk analysis to ensure the storage is designed so product is kept under conditions not detrimental to food safety and quality.

13.6.5 Loading, Transport and Unloading Practices

Element	Description	Primary Response	Evidence
13.6.5.1	The practices applied during loading, transport and unloading of food contact packaging shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Packaging shall be loaded, transported and unloaded under conditions suitable to prevent cross contamination.	Compliant	

13.6.5 Loading, Transport and Unloading Practices Summary

A policy defining the practices for loading, unloading and storage of food products has been documented and implemented. It was observed during the audit tours that food is unloaded, stored and loaded under conditions that prevent cross contamination.

13.6.6 Loading/Unloading

Element	Description	Primary Response	Evidence
13.6.6.1	Vehicles (trucks/vans/containers) used for transporting of food contact packaging shall be inspected prior to loading to ensure they are clean, in good repair,	Compliant	

	suitable for the purpose and free from odors or other conditions that may impact negatively on the product.		
13.6.6.2	Loading practices shall be designed to minimize unnecessary exposure of product to conditions detrimental to maintaining product integrity.	Compliant	

13.6.6 Loading/Unloading Summary

The supplier's policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading. Documentation was reviewed for 2 incoming roll stock shipments during the audit tours that loading practices do not expose products to detrimental conditions.

13.7.1 Process Flow

Element	Description	Primary Response	Evidence
13.7.1.1	The process flow shall be designed to prevent cross contamination and organized so that there is a continuous flow of product through the process.	Compliant	
13.7.1.2	The flow of personnel shall be managed such that the potential for contamination is minimized	Compliant	

13.7.1 Process Flow Summary

The process flow is logical with a continuous flow and designed to prevent cross contamination. It was observed during audit tours that the flow of employees is such that any cross contamination is minimal.

13.7.2 Control of Foreign Matter

Element	Description	Primary Response	Evidence
13.7.1.4	Wooden pallets and other wooden utensils used in packaging handling and storage shall be dedicated for that purpose, clean, maintained in good order and their condition subject to regular inspection.	Compliant	
13.7.2.1	The responsibility and methods used to prevent foreign matter contamination of product shall be documented, implemented and communicated to all staff.	Compliant	
13.7.2.2	Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not detached or become damaged or deteriorated. The use of temporary fasteners such as string, wire or tape to fix or hold equipment shall not be permitted.	Compliant	
13.7.2.3	The following preventative measures shall be implemented where applicable to prevent glass contamination: all glass objects or similar material in food handling/contact zones shall be listed in a glass register including details of their location, containers, equipment and other utensils made of glass, porcelain,	Compliant	

	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, conduct regular inspections of food handling/contact zones to ensure they are free of glass or other like material and to establish no changes to the condition of the objects listed in the glass register, inspect glass instrument dial covers on processing equipment and MIG thermometers at the start and finish of each shift to confirm they have not been damaged.		
13.7.2.5	Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.	Compliant	

13.7.2 Control of Foreign Matter Summary

A policy defining the methods and responsibilities for preventing foreign material contamination has been documented and implemented. Pre-operational inspections and regularly scheduled maintenance inspections are conducted and documented for the condition of equipment and any potential contaminants. A glass register has been documented with glass, brittle plastic and ceramic sources included in all areas of the plant. The register is current as of 12-8-17. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred and items are not missing or moved. The last inspection conducted on 11-30-17 was reviewed and found to be completed as scheduled. Wood pallets were clean and in good condition and the facility has a policy prohibiting and/or controlling wooden utensils in processing/food handling areas. Periodic maintenance inspections include looking for loose objects and potential contaminants from overheads.

13.7.3 Managing Foreign Matter Contamination Incidents

Element	Description	Primary Response	Evidence
13.7.3.1	In all case of foreign matter contamination the affected batch or item shall be isolated imspected, reworked or disposed of.	Compliant	
13.7.3.2	In circumstances where glass or similar material breakage occurs the affected area is to be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.	Compliant	

13.7.3 Managing Foreign Matter Contamination Incidents Summary

The supplier's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection occur if a glass breakage were to occur. A Quality department representative is required to inspect the affected area before the restarting of production.

13.8.1 Dry and Liquid Waste Disposal

Element	Description	Primary Response	Evidence

13.8.1.1	The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.	Compliant	
13.8.1.2	Waste shall be removed on a regular basis and not build up in food handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until such time as external waste collection is undertaken.	Compliant	
13.8.1.3	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.	Compliant	
13.8.1.4	A documented procedure shall be in place for the controlled disposal of trademarked or other printed materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.	Compliant	
13.8.1.5	Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.	Compliant	

13.8.1 Dry and Liquid Waste Disposal Summary

A policy defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented, in document entitled Waste Disposal. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas were observed to be well maintained and clean on the exterior of the facility. Solid waste from processing was observed to be properly disposed of.

13.9.1 Grounds and Roadways

Element	Description	Primary Response	Evidence
13.9.1.1	The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste or accumulated debris so as not to attract pests and vermin.	Compliant	
13.9.1.2	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.	Compliant	
13.9.1.3	Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.	Compliant	

13.9.1 Grounds and Roadways Summary

The grounds and surrounding areas were observed to be free of dust and waste so pests are not attracted. Paths, roadways and dock areas were well maintained and walkways from the parking lot and other employee amenities were paved and sealed.