SQFI Audit Report

I. Company Information

Company Name	El Dorado Shipping Sack Manufacturer		**Company #**		12464
Address	2750 145th St. West				
City	Rosemount	**State**	Minnesota	**Zip Code**	55068
Country	United States	**Phone #**	612-834-3670		
SQF Practitioner	Jackie D'Amico	**Email**	jackie.damico@eldoradopkg.com		
Food Sector Categories	27 - Manufacture of Food Sector Packaging Materials				
Modules Audited	Module 2 Level 2, Module 13				
Certified Products	Multiwalled paper bags				

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	Document	**Level**	LEVEL 2
Start Date	25/Apr/2017	**End Date**	26/Apr/2017
Scope of Certification	Exclusions: Scope: Printing, Tubing and Bottoming for multiwall paper bags and small paper bags		

IV. Audit Team

First Name	Last Name	Person #	Role
Thomas	Cain	120673	Lead Auditor

V. Audit Duration

Actual Start Date	25/Apr/2017	**Actual End Date**	26/Apr/2017
Hours Spent at Facility	12	**Hours Spent Writing Report**	4

VI. Certification Decision

Certificate Decision Date	03/Aug/2017	**Certificate Issue Date**	04/AUG/2017

Audit Score	96%	**Audit Rating**	Excellent
Certification #	12464		
Re-certification Date		**Expiration Date**	
Surveillance Audit Due Date		**Certification Decision**	

VII. Non-Conformities

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.	Minor	Minor: The supplier has established verification procedures that are not organized or calendarized to ensure that each record is verified.
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.	Minor	MINOR: The Product Traceability Procedure does not include a procedure to trace or recall backward to raw materials.
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	Minor	Minor: There is no training skills register at the time of this desk audit.

	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.		
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.	Minor	Minor: There is not a foreign matter contamination procedure at the time of this audit.

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

Element	Description	Primary Response	Root Cause
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.	Minor	All the verification activities were being completed. No list of what those activities were developed at the time of the audit
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	Minor	It was previously accepted in AIB to use Recall procedure as a one up and a one back. It was not known that specifics on tracing backwards to materials as we do it all at one time in our process

	product is reworked; and the effectiveness of the product trace system shall be tested at least annually.		
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.	Minor	Training register was developed, but failed to add date of training and it was overly complicated.
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.	Minor	Thought that the HACCP Plan and the PRP covered this section, but see that it did not include all requirements

IX. Corrective Actions

Clause	Primary Response	Corrective Action *(Supplier)*	Verification of Closeout *(Certification Body)*	Required Completion Date	Close Out *(CB)*
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.	Minor	A list of verification activities with frequencies and responsibilities was developed and has been assigned as A-250-001 Verification and Validation Register A 4/26/2017		26/May/2017	31/May/2017
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	Minor	Added verbiage to P-260 Product ID, Trace Withdrawal & Recall for raw material tracing. Add verbiage to F-260-010 Mock recall form for raw		26/May/2017	31/May/2017

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.		materials			
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.	Minor	: Found out that we can use the Kronos HR software to track all training by employee. Sample will be sent with this CAR		26/May/2017	31/May/2017
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.	Minor	Created procedure # P-243-001 Foreign Matter Contamination.		26/May/2017	31/May/2017

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)	Jackie D'Amico: Director of Quality, Safety, Environmental Management, Nicole Patterson: Plant Supervisor, SQF Coordinator and Quality.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by comas)	Jackie D'Amico: Director of Quality, Safety, Environmental Management, Nicole Patterson: Plant Supervisor, SQF Coordinator and Quality.
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 an SQF V 7.2 Level 2 Desk Audit. El Dorado Shipping Sack Manufacturers are located in Rosemount, Minnesota near Minneapolis. Employing 79 people including management and hourly. The facility is 160,000 square feet producing PBOM (Pasted Bottom Open Mouth) and SOM (Sewn Open Mouth) sacks for the seed, feed, solid food ingredients. Operating 5 days per week on two shifts. The building was erected in 1962 for this business, it is Cinder block walls and concrete floors.
Auditor Recommendation	Auditor Recommendation	Conduct facility audit when all corrective actions are approved and verified

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 entitled the SQF Food Safety Procedure that is implemented by senior management. 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 and communicated to the facility's staff by way of Annual Training. Food safety objectives are established. The policy statement is signed by the senior manager, dated 04/12/2016.

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	
2.1.2.4	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, 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 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.	Compliant	

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	
2.1.2.8	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 Management Responsibility Summary

The organization chart and the job descriptions in the Attachments Manual cover those with food safety responsibilities, including the Fork Lift Operator. Director Quality, Safety, Environmental, Lean and General Plant Manager. Jackie D'Amico is the designated SQF Practitioner, who has overseen the development of the SQF System, is a full time employee of the company, and has a HACCP certificate dated Fall 2015, and a SQF Certificate dated 1/18/16. The local Quality Coordinator is the backup SQF Practitioner, who also has these documents on file. The Training Procedure is written in Training dated 1/26/17, and states who receives training, monthly refresher training, new hire training, and other training for reinforcing food safety and quality standards. Training is conducted by the QA Manager. The training topics include Food Safety, HACCP,and Food Packing Material GMPs and other appropriate training topics for this operation. Coverage for absences is addressed in the Designated Backup Personnel Register. In the GMP policy, it is stated that employees must report food packing material safety and quality problems to responsible managers, who can perform corrective actions.

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 written and maintained in electronic and hard copy form. The manual is entitled the SQF Quality Manual and dated 04/12/17. It contains the methods and procedures used to meet the requirements of the SQF Code. It is available to staff and has a summary of the facility's food safety policies. Also included are the organization chart, the scope of the certification, and a list of the products to be covered in the SQF certification. The food safety manual includes written procedures, prerequisite programs, HACCP plans and other documentation that support the implementation of the facility's SQF System.

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	
2.1.4.4	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 Management Review (M) Summary

The senior management team is responsible for reviewing the SQF System and documenting the review procedure on an annual basis, as documented in the Food Safety Procedure at 4.9.1. Management Reviews include the policy manual, internal and external audit findings, corrective actions and their investigations and resolution, customer complaints and their resolution and investigation.

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 personnel knowledgeable about the incidents.	Compliant	

2.1.5 Complaint Management Summary

The facility's Complaint Management Procedure of that name covers how complaints are received, recorded, and logged into the corrective action log. The procedure states that the plant management and quality control are responsible for investigation of the complaints.

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 Business Continuity Planning Summary

The supplier's written Business Continuity Plan is found in the Document entitled the Business Continuity Plan, and located in the Procedures Manual. The plan addresses known threats to the interruption of the business, such as Cyber Attack, chemical spill, floods and water damage. A senior manager, the Plant General Manger, has oversight of the plan and a crisis management team has been identified and the team was trained on 3/17/17. The Plan includes procedures for 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. It also includes provision for a review and testing using a mock crisis/disaster scenario on an annual basis.

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 Document Control Summary

The supplier has written and implemented a policy entitled Document Control and records, dated 04/23/17, defining the methods and responsibilities for document control. The register of SQF documents is entitled SQF Documents and is found in the manual of procedures.

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 Records (M) Summary
The supplier has written and implemented a policy for verifying and retaining records in the document called Documents and Records. 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. Provision is made for product and production records retention for 2 years.

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 Product Development and Realization Summary
Procedures describing the methods and responsibilities for commercialization of new products, entitled Specification and Product documented and on file in the SQF System Procedures. Procedures conducted for new products at the facility include checking graphics and processes with production trials, and product testing. All product development is done in cooperation and by direction of the customer. Procedures for handling and storage requirements are included in specifications where required. The HACCP plan is not revised and validated for each new product.

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	
2.3.2.7	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, and related materials have been documented. The current registers for raw materials are on file in the Forms binder. Packaging materials specifications are on file in electronic files and labels are on file in vendor quality files. A procedure defining the methods and responsibilities for developing and maintaining specifications has been documented and implemented in Specifications and Product Development. Raw and packaging materials are validated to ensure product safety, regulatory requirements and quality are met by means of the receipt of Letters of Guarantee, Certificates of Compliance or Certificates of Analysis. Food contact packaging is validated to prevent chemical migration by Letter of conformance. Product labels are approved by the customer, who is qualified to ensure 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 Service Provider Register. A list of current contract service providers is maintained in the Contract Service Provider Register, and found to include providers of services including Pest Control, uniforms service.

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 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 properly approved by Corporate Management Specifications include microbiological and chemical limits where required. Labeling and packaging requirements are also included where required. A register of all current finished product specifications is maintained in the HACCP plan.			

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	Compliant	

	of a regulatory warning letter).		

2.4.1 Food Legislation (Regulation) (M) Summary

The supplier has ensured that product delivered to customers complies with regulatory requirements, including DOT / OSHA . The supplier keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of PSSNA. 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 in the emergency phone list.

2.4.2 Food Safety Fundamentals (M)

Element	Description	Primary Response	Evidence
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 supplier has written and documented the food safety fundamentals , the pre-requisite programs that are applicable to the scope of this certification, are based on Module 13. These food packing material safety pre-requisite program documents are on file in The Prerequisite Program Manual. The effectiveness of the pre-requisite programs is verified based on a schedule, which is found in the Document Register.

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	Compliant	

	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.		

2.4.3 Food Safety Plan (M) Summary

A Food Safety (HACCP) Plan has been developed, implemented and maintained by the supplier. It is kept on file in SQF Attachments and maintained by the SQF Practitioner. The HACCP Plan has been prepared in accordance with the steps identified in the Codex Alimentarius Commission or NACMCF HACCP guidelines. A HACCP Team has been identified and trained, with documentation found in SQF Attachments. The Plan includes a list of all products in the scope of the certification, a complete product description, and flow diagrams for each process including the steps in the process. The Rosemount HACCP team has determined there are no CCPs. This is based on the hazard analysis including physical, chemical and microbiological hazards for each process step, ingredient and packaging. The HACCP Plan is dated 4/23/17 and signed by the SQF Practitioner, a senior manager of the corporation.

2.4.5 Incoming Goods and Services

Element	Description	Primary Response	Evidence
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, dated 03/02/16, which 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 procedures for emergency use of non-approved suppliers is documented. A register of current approved suppliers is on file in the HACCP Plan.

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 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.	Compliant	

2.4.6 Non-conforming Product or Equipment Summary

The supplier has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in document Control of Nonconforming Product or Equipment. Methods to segregate, identify, handle and dispose of product are identified to minimize any inadvertent use. Disposition of hold items is the responsibility of the SQF Practitioner.

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 Product Rework Summary

The supplier has written procedures and designated responsibilities for reworking product. Reworked product is clearly identified, traceable, inspected and analyzed before release. Rework products and operations are the responsibility of shift coordinator and line lead.

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

2.4.8 Product Release (M) Summary

The supplier has written procedures entitled Finished Product Release, dated 1/20/17 that cover the releasing of finished products. This includes ensuring that all product testing, inspections and analyses have been verified and recorded by authorized personnel to show that all food safety and quality controls have been met. This is the responsibility of shift supervision.

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 Stock Rotation Summary

The supplier has a written policy, found in the document Finished Product Release, dated 1/20/17, defining the procedures for stock rotation. These procedures ensure that ingredients, packaging and work-in-progress are used within the defined shelf-life.

2.5.1 Responsibility, Frequency and Methods

Element	Description	Primary Response	Evidence
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 Responsibility, Frequency and Methods Summary

A schedule for validation and verification activities is documented. This schedule is found in the 5S book and the Document Register. The Quality Coordinator and lead persons are

responsible for validating and verifying food safety fundamentals and quality control limits.

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 Validation & Effectiveness (M) Summary

The methods, responsibilities and criteria for verifying the effectiveness of pre-requisite programs and validating control limits have been documented in the 5S book and the Document Register. Written procedures to ensure pre-requisite programs are effective are documented in PRP 13.1 Site Requirements and Approval. There is a process to ensure critical control food safety limits are re-validated at least annually by the SQF Practitioner.

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, dated 02/26/17, outlining the verification activities, methods and responsibilities for each activity. The schedule is found in the Prerequisite Program manual and maintained by the Quality Coordinator.

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.	Minor	Minor: The supplier has established verification procedures that are not organized or calendarized to ensure that each record is verified.
2.5.4 Verification of Monitoring Activities (M) Summary			
The supplier has established a verification schedule, dated 02/26/17. The schedule is found in the Prerequisite Program manual and maintained by the Quality Coordinator. Minor: The supplier has established verification procedures that are not organized to ensure that each record is verified.			

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 Corrective and Preventative Action (M) Summary			
The supplier's Corrective and Preventative Action program is written in Corrections and Corrective Actions. 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 a requirement of this program. The designated manager responsible for this program is the SQF Practitioner.			

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 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	Compliant	

	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 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 Product Sampling Inspections Analysis. Inspections are scheduled at regular intervals to agreed specifications, and label requirements. Requirements of Certificates of Analyses are required for ingredient ink.

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 Internal Audits (M) Summary

The facility's procedure for scheduling and conducting internal audits to measure the effectiveness of the SQF system is written in document Internal Audits. The Internal Audit Program is maintained by the Quality Coordinator. Facility and equipment inspections, internal audits of the food safety plan are part of the internal audit programs. The frequency of the audits established in the procedure and it is communicated to management. The SQF Practitioner is designated as the responsible manager to see that corrective actions are documented.

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 Product Identification (M) Summary
A policy defining how products are identified from receipt through production and shipping is documented in Product Identification, Trace, Withdrawal. The supplier's identification system ensures all materials, work-in-progress and finished goods are clearly identified at all stages of production.

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.	Minor	MINOR: The Product Traceability Procedure does not include a procedure to trace or recall backward to raw materials.

2.6.2 Product Trace (M) Summary
A policy that defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back) is written in page 4 Product Identification. Any rework is identified to ensure traceability. It is a requirement of this policy that the effectiveness of the trace system is conducted at twice annually, one step back and one step forward. MINOR: The Product Traceability Procedure does not include a procedure to trace or recall backward to raw materials.

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 Product Withdrawal and Recall (M) Summary
A written policy defines the methods and responsibilities for withdrawing and recalling product if necessary. It is found in Trace Withdrawal and Recall. A recall team has been designated and is led by SQF Practitioner. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action.

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 Food Defense Policy of that name in which the methods, responsibilities and criteria for preventing food adulteration has been documented. A food defense protocol includes the name of the senior management responsible for food defense, the SQF Practitioner, 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.

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	Compliant	

	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 segregation is not possible.		

2.8.2 Allergen Management Summary

The supplier's Allergen Management Policy to control allergens and prevent contamination of other products is documented. It is found in the document entitled Allergen Control Program and is the responsibility of the SQF Practitioner and the HACCP Team. There are no allergens of concern in the normal production operations. Procedures are documented for the cleaning of food contact surfaces, including the periodic validation of cleaning methods by protein-specific testing.

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 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.	Compliant	

2.9.2 Training Program (M) Summary

The supplier has a documented training program 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 SQF Practitioner.

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 topics are identified in the Training Program named Training. The proper refresher training is required per this policy for all personnel to ensure food safety, quality and the SQF system are maintained. Specific refresher training topics are covered on a annual basis.

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.	Minor	Minor: There is no training skills register at the time of this desk audit.

2.9.7 Training Skills Register Summary

Minor: There is no training skills register at the time of this desk audit.

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 Premises and Equipment Maintenance Summary

A policy defines the methods and responsibilities for the maintenance and repair of all plant equipment and buildings. That policy exists at E-Maint Work Order Process. When repairs and maintenance work are completed, personnel document accounting of tools and cleanliness of the work areas.

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 Calibration Summary			
A policy defines the methods and responsibilities for calibrating measuring, testing and inspection equipment and has been implemented as Calibration of Equipment. The facility has developed a calibration schedule with all devices listed. This documentation is located in Control and Calibration of Measuring and Testing Equipment. SQF Attachments. 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 Calibration of Equipment.			

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 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.	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 at procedure Trap Line Inspections. A Pest Control Operator has been contracted for pest management and an updated scope of service dated 1/1/17 defines the methods of pest control, frequency of interior and exterior inspections and targeted pests. A current site map, dated 1/1/17 is accurate showing the location of external and internal devices. A pesticide application log gives details and dates of all chemical usage. Licenses of the Pest Control Operator dated expires 12/31/17 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 the PCO log 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.

13.2.11 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	
13.2.11.5	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 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. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods, including daily, weekly, monthly, quarterly and annually frequencies.

13.4.1 Staff Engaged in Handling of Food Contact Packaging

Element	Description	Primary Response	Evidence
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 Staff Engaged in Handling of Food Contact Packaging Summary

Packaging handling and storage procedures for all employees are documented and implemented located in the procedures as Handling, Storage, Packaging, and Preservation

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.	N/A	N/A: The Company does not use temporary storage for packaging materials.
13.6.4 Alternative Storage and Handling of Goods Summary			
N/A: The Company does not use temporary storage for packaging materials.			

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 contact packaging has been documented and implemented as Truck Loading and Truck Receiving. It was observed during the audit tours that food contact packing material is unloaded, stored and loaded under conditions that prevent cross contamination.			

13.7.2 Control of Foreign Matter

Element	Description	Primary Response	Evidence
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.	Minor	Minor: There is not a foreign matter contamination procedure at the time of this audit.
13.7.2 Control of Foreign Matter Summary			
Metal is defined as a control point in the HACCP Plan. Minor: There is not a foreign matter contamination procedure at the time of this audit.			

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	
13.8.1.4	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 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 Baling Scrap.			