Audit Information

Audit Type: SQF Food Safety Audit Edition 8.0
Audit Number: 89400
Supplier: Smithfield Packaged Meats Corp.(45735)
Company Name: Smithfield Fresh Meats Corp. - North
Company Number: 10132
Company Address:
601 N. Church St.
Smithfield, VA 23430
United States
Certification Body: Mérieux NutriSciences Certification
Certification Body Address:
111 East Wacker Dr
Suite 2300
Chicago, IL 60601
United States
CB#: CB-1-Mérieux
Accreditation Body: JAS-ANZ
Accreditation Number: Z3720906AB

Audit Duration: 06/25/2019 - 06/28/2019
Time Spent Auditing: 28 hours
Time Spent Writing Report: 7 hours
Certification Issue Date: 09/06/2019
Certification #: 104318
Certification Type: Recertification
Audit Rating/Score: Good / 91
Certification Decision Date: 09/06/2019
Certification Expiration Date: 08/28/2020
Certification Decision: Certified
Food Sector Categories:
7. Slaughterhouse, Boning and Butchery Operations
8. Processing of Manufactured Meats and Poultry
Products: (7) Slaughter (8) Bacon, Smoked Meat, RTE Bacon, Dry Cured Ham
Scope of Certification: (7) Slaughter (8) Bacon, Smoked Meat, RTE Bacon, Dry Cured Ham

Audit Team

FIRST NAME	LAST NAME	PERSON #	ROLE
Jaime	Lastra	10049	Lead Auditor
Melissa	Ames	9747	Technical Reviewer

Non-Conformities

ELEMENT	PRIMARY RESPONSE	EVIDENCE
9.2.6.2/11.2.5.2	Minor	Minor – Two light fixture covers were observed broken above the RTE Room.
9.2.8.2/11.2.7.2	Minor	Minor – Dock doors 22 and 23 had openings at the bottom corners due to missing seal or brushes. Dock door 29 was left opened.
9.2.10.2/11.2.9.2	Minor	Minor – A clock plastic cover was broken with missing pieces above the Kill Office door.
9.2.11.2/11.2.10.2	Minor	Minor – Loose screws were observed on a plastic wall cover next to an ice storage tote.
9.2.11.9/11.2.10.9	Minor	Minor – A non-food contact tool was left inside a food container. The tool (wrench) had the handle cover broken.
9.2.14.2/11.2.13.2	Minor	Minor – An exhaust fan screen above an ice tote was observed dirty with dust buildup.
9.3.1.4/11.3.1.4	Minor	Minor – Candy wrapping and a beverage plastic bottle was observed inside the PAA Room.
9.6.4.1/11.6.2.1	Minor	Minor – Condensation was observed on a part of the ceiling above the Raw Finished Product Warehouse.
9.10.1.1/11.10.1.1	Minor	Minor – Garbage and debris were observed outside the of the high voltage area.

Root Cause Analysis

ELEMENT	PRIMARY RESPONSE	ROOT CAUSE
9.2.6.2/11.2.5.2	Minor	The facility currently monitors all light fixtures through the glass and brittle plastic audits which was not frequent enough to identify the issues noted during the audit.
9.2.8.2/11.2.7.2	Minor	doors not being PM'd enough by maintence this PM is being moved up with more frequency
9.2.10.2/11.2.9.2	Minor	The facility currently monitors all light fixtures through the glass and brittle plastic audits which was not frequent enough to identify the issues noted during the audit.
9.2.11.2/11.2.10.2	Minor	Loose screws were not identifed as an issue during routine PM in the offal pack area.
9.2.11.9/11.2.10.9	Minor	Failure to follow best practices in an RTE environment. Proper equipment needed not available.
9.2.14.2/11.2.13.2	Minor	The fan was not listed on the master sanitation cleaning schedule.
9.3.1.4/11.3.1.4	Minor	Failure to follow facility GMP policy.
9.6.4.1/11.6.2.1	Minor	The cooling unit were not set to correct temperature in area
9.10.1.1/11.10.1.1	Minor	The area inside the voltage area cage was not specifically listed on the outside grounds cleanup rounds.

Corrective Actions

CLAUSE	PRIMARY RESPONSE	CORRECTIVE ACTION	VERIFICATION OF CLOSEOUT	COMPLETION DATE	CLOSE OUT
9.2.6.2/11.2.5.2	Minor	Maintenance repaired these on third shift. Light covers were replaced and pictures of repairs were taken.	JL: Based on the information sent regarding the increasing in the light inspection frequency, the NC is closed.	07/08/2019	07/26/2019
9.2.8.2/11.2.7.2	Minor	work order for seals seals replaced	JL: Based on the information sent regarding the increasing in the dock door maintenance inspection frequency, the NC is closed.	07/15/2019	07/26/2019
9.2.10.2/11.2.9.2	Minor	A cover was modified and installed for the clock.	JL: Based on the information sent regarding the addition of the clock in the glass/brittle plastic inspection frequency and by the actions taken during the audit, the NC is closed.	06/26/2019	07/26/2019
9.2.11.2/11.2.10.2	Minor	The entire area was reviewed for loose screws and all identified were corrected.	JL: Based on the information sent regarding the repairs ice plastic cover, the NC is closed.	06/26/2019	07/26/2019
9.2.11.9/11.2.10.9	Minor	The damaged tool was removed permanantly from the RTE room. The fabrication shop made dippable tool boxes for sanitary conditions. Pictures of improvements were taken to show changes.	JL: Based on the information sent regarding the monitoring of tools by the maintenance staff and bythe actions taken during the audit, the NC is closed.	07/02/2019	07/26/2019
9.2.14.2/11.2.13.2	Minor	The fan was cleaned by sanitation and added to the master sanitation schedule.	JL: Based on the information sent regarding the monitoring/addition of the fan to the masters sanitation plan, the NC is closed.	06/26/2019	07/26/2019
9.3.1.4/11.3.1.4	Minor	The area was immediately picked up to remove all trash and clutter.	JL: Based on the employee training/couching conducted during the audit regarding GMP's, the NC is closed.	06/26/2019	07/26/2019
9.6.4.1/11.6.2.1	Minor	Refrigeration was called to correct the temperature setting of the unit and the condensation was removed.	JL: Based on the corrective actions conducted during the audit regarding the reset of the correct temperatures, the NC is closed.	06/30/2019	07/26/2019
9.10.1.1/11.10.1.1	Minor	Cleaned up all three High voltage area- completed 7/24/19.	JL: Based on the corrective actions conducted during the audit regarding the cleaning and the addition of the cage to the sanitation schedule, the NC is closed.	07/24/2019	07/26/2019

Statements

SECTION	ELEMENT	EVIDENCE
Audit Statement Audit	SQF Practitioner Name	Amy Smith: Food Safety Manager
	SQF Practitioner Email	ajsmith@smithfield.com
	Opening Meeting	George Enderlin: General Manager, Matt Opanski: Asst. General Manager, Jillian Goodrich: Corporate Food Safety Manager, Melanie Hayes: Corporate Food Safety Manager, Antiquea Awen: Corporate Quality Assurance Manager, Alex Potter: Quality Assurance Manager (Plant), Amy Smith: Food Safety Manager (Plant), Jaime Lastra: SQF Auditor.
	Auditor Recommendation	It is the auditor's recommendation that the facility would maintain the certification after all NCR's have been completed.
	Closing Meeting	George Enderlin: General Manager, Matt Opanski: Asst. General Manager, Jillian Goodrich: Corporate Food Safety Manager, Melanie Hayes: Corporate Food Safety Manager, Antiquea Awen: Corporate Quality Assurance Manager, Alex Potter: Quality Assurance Manager (Plant), Amy Smith: Food Safety Manager (Plant), Jaime Lastra: SQF Auditor.
	Facility Description	The Smithfield (North) facility in Smithfield, VA is a processor of fresh pork cuts, bacon, smoked ready to eat ham, fully cooked bacon, pork cuts, fresh pork sausage, and poultry. This facility is USDA inspected as Est.221A and P9912. It is a two story building with 695,000 sq ft of process and storage space. The original building was built in 1961 with several expansions and modifications since that time. It operates 2 shifts on 5-6 days of the week. The micro wave section operates 24/7 and is approved for 72 hour continuous production. Sanitation is conducted on the third shift. The layout of the facility on two levels includes the livestock holding area, kill floor, cut floor, boning area, smoke houses for pork and poultry, pork coolers, thaw coolers, packaging area, shipping and receiving area. Five HACCP plans are documented.

Result List

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
2.1.1 Food Safety Policy	2.1.1.1	Compliant	
	2.1.1.2	Compliant	
Section Summary: The Smithfield Company Commitment Statement (Food Safety and Quality Policy Implementation) was documented and signed by the General Manager. The statement was displayed at management and employees entrances to the plant, cafeteria and main hallway. The policy is communicated through training programs for new hires as well as in the annual training program for all employees. The statement communicated the organization's commitment to food safe and quality food under SQF requirements and regulatory guidelines. The policy includes the organization's commitment to safe, quality food meting regulatory and SQF requirements as well as customer food safety and quality requirements. The Policy Statement states the food safety and quality objectives and the plant management staff responsibility for the implementation of continues improvement program. The policy was posted in English and Spanish.			
2.1.2 Management Responsibility	2.1.2.1	Compliant	
	2.1.2.2	Compliant	
	2.1.2.3	Compliant	
	2.1.2.4	Compliant	
	2.1.2.5	Compliant	
	2.1.2.6	Compliant	
	2.1.2.7	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	2.1.2.8	Compliant	
	2.1.2.9	Compliant	
	2.1.2.10	Compliant	
	2.1.2.11	Compliant	

Section Summary: Management Responsibilities are outlines in the Food Safety and Quality Implementation/Management Responsibility – 2.1.2-2/6/2018. The procedure include the development of the Food Safety and Quality Policy Implementation – 2019, a plan organizational chart demonstrating employees with food safety and food quality responsibilities (Food Safety/Quality Assurance Organizational Chart -2019), commitment to supply safety/quality food products, the methods used to comply with customer and regulatory requirements, the designation of two full-time (Food Safety Plant Manager) employee as the SQF Practitioner, with a HACCP training certifications issued 8/30-31/19 and SQF Implementation Certificate issued , SQF Practitioner responsibilities related to the SQF certification for food safety and product quality, the implementation of a training program (Food Safety and Quality Employee Training) Training Program based on employee job position training needs, food safety and food quality requirements, the responsibility to report food safety and quality problems to personnel with authority to initiate action (verified by documentation reviews and employee interviews). Corporate management and the plant senior management have ensured adequate resources are available to achieve food safety and quality objectives and to support the development, implementation, maintenance and ongoing improvement of the SQF System for food safety and product quality. This was demonstrated through the entire audit. Job description of employees with food safety and product quality responsibilities were reviewed for Plant Quality Assurance Manager, Plant Food Safety Manager, Quality Assurance Supervisor, Senior Food Safety Technologist and Food Safety Supervisor. The facility management demonstrate and measure continuous improvements of the SQF system though an annual management review and internal/external audits, customer feedback that measures improvement for equipment and facility, personnel training , employee safety and programs and practices. Backups for all employees responsible for food safety and quality are outlined in the Job Descriptions.

2.1.3 Management Review	2.1.3.1	Compliant	
	2.1.3.2	Compliant	
	2.1.3.3	Compliant	
	2.1.3.4	Compliant	

Section Summary: Guidelines for an Annual Management Review are outlined in the 2.1.13 Management Review Policy. The Annual SQF Management Review process was established and maintained by the Management Team coordinated by the SQF Practitioners. The SQF annual Review covers food safety and product quality processes and related documentation. The process is documented in the Management Annual Review 2018/2019. The Annual Management Review included Policy Manual, finding in internal/external audits with corrective actions, customer complaints and corrective actions, pre-requisite programs, recall program, food quality system, food safety system, quality parameter limits, specifications requirement/product development, mock recalls, product identification/traceability, SQF system verification/validation food defense, corrective and preventive actions, non-conforming product and equipment, crisis management, document control, training , allergen/identity preserved foods and food defense plan. The SQF practitioners and management staff are responsible for validating changes to food safety fundamentals and food quality plans. Major and minor changes to the food safety plan are required to be reviewed by the SQF practitioners. Food safety fundamentals and perquisites changes are documented under the SQF Management Review document, and under HACCP Plan Reassessment. Document changes are validated by the SQF Practitioners though a SQF Practitioner (QA&FS) Yearly Assessment.

2.1.4 Complaint Management	2.1.4.1	Compliant	
	2.1.4.2	Compliant	
	2.1.4.3	Compliant	
	2.1.4.4	Compliant	

Section Summary: The methods and responsibility for handling and investigating food safety or product quality related issues customer complaints are outlined in the Customer and Consumer Complaint Management Procedures – 7/12/18. The programs include responsibility for handling and investigating the cause and resolution of customer complaints at the plant by the QA/FS Team and documented in the Consumer Incident by Plant and Reason. Complaints are analyzed and report to plant management on a weekly basis based on the complaint issue (Food Safety, Product Quality and Packaging issues) on a weekly basis. Customer complaint reports, corrective actions, investigations and preventive steps are recorded in a computer based system (Qual-Track). Trends are reviewed by the plant management team on a weekly basis. Customer complaints corrective actions and issue investigations were included in the customer reports. Records included reference number, date, product code/identification, product description, complaint description, corrective action, preventive action and responsible. Customer complaints were reviewed for dates 6/11, 14, 17, 81/2019. Trend analyses by Reason Year over Year –FYI-2018 were reviewed.

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
2.1.5 Crisis Management Planning	2.1.5.1	Compliant	
	2.1.5.2	Compliant	
	2.1.5.3	Compliant	
	2.1.5.4	Compliant	

Section Summary: A Crisis Management Manual and Continuity Business Plan (June 2019) is in place and developed based on the specific known threats to a business for this facility's location. The plan includes a product food safety and product quality assessment conducted by the Food Safety Team and QA Team and verified by plant manager. Threats such as natural disasters, active shooting, fire, floods, electrical failure and product recalls were covered under the Crisis Manual. The facility conducted a crisis drill for ammonia release was conducted to test the plan on 3/29/2019. The drill included a food safety and product quality assessments performed by Fs/QA staff. The results of the drill were documented in the Business Continuity Plan Test/Verification Sheet. The Crisis Management Plan is lead by the Plant Manager with the help from the Crisis Team. Report records included reference number, date, product code/identification, product description, complaint description, corrective action, preventive action and responsible.

2.2.1 Food Safety Management System	2.2.1.1	Compliant	
	2.2.1.2	Compliant	

Section Summary: A Facility Food Safety Guidelines and Specifications were in place, maintained by the HACCP Team and Quality Team. The Guidelines included five HACCP plans for: HACCP 1 – Swine Slaughter Operation, HACCP 2 - Raw Not Ground Pork Products, HACCP 3 – Not Heat Treated, Shelf Stable, HACCP 4 – Heat Treated, Not Fully Cooked, Not Shelf Stable and Heat Treated, Not Fully Cooked, Shelf Stable and HACCP 5 – Heat Treated, Fully Cooked, not Shelf Stable and Heat Treated, Fully Cooked, Shelf Stable. The facility HACCP Team and the Quality Team haves also implemented a Quality Plan based on HACCP principles. The manuals includes the methods used to meet the requirements of the SQF System requirements for food safety product quality, the HACCP Plan and Quality policies, the scope of certification for SQF at Level of Food Safety/Quality (3). The plans included pre-requisite programs, food safety plans, ingredient and process hazard analysis, product quality standards and product description.

2.2.2 Document Control	2.2.2.1	Compliant	
	2.2.2.2	Compliant	
	2.2.2.3	Compliant	

Section Summary: A Document control program (Records Management Policy) is in place for printed and electronic documents. The procedure includes methods and responsibility for the control of procedures, policies, programs and monitoring logs. The procedure outlines new document development process and approvals, document reviews, inspection records/forms document control list, document review, revision, document storage, retention-archive time/schedule and disposition. The facility maintains a document register (Procedure Index – 2019) of system documents and a records retention schedule. The register was available in the in a hard copy. Documents are kept in the QA Manager office and in a company computer database system (Qualtrax) Document Register – 04/05/2018. Document register includes; document description, document code, version, modified date, modified by, approved date, approved by and reason.

2.2.3 Records	2.2.3.1	Compliant	
	2.2.3.2	Compliant	
	2.2.3.3	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: A Document control program (Records Management Policy) is in place for printed and electronic documents. The procedure includes methods and responsibility for the control of procedures, policies, programs and monitoring logs. The procedure outlines new document development process and approvals, document reviews, inspection records/forms document control list, document review, revision, document storage, retention-archive time/schedule and disposition. The facility maintains a document register (Procedure Index – 2019) of system documents and a records retention schedule. The register was available in the in a hard copy. Documents are kept in the QA Manager office and in a company computer database system (Qualtrax) Document Register – 04/05/2018. Document register includes; document description, document code, version, modified date, modified by, approved date, approved by and reason. Records were accessible, retrievable, securely stored in computer system files, signed, complete and verified by supervisor. During the audit the following monitoring records were reviewed for; CQP's/ CCP's records for dates 2/11-14/19, 4/15-18/19 and 6/17-20/19, product rework records (6/25-27/2019), Product release records (Pre-shipment forms) were reviewed for 6/25-27/2019, records containing product identification and traceability information were reviewed for receiving /shipping, dry ingredient receiving, spice tracking and verification form, finished product shipping records, product analysis, carcass monitoring log, variety meats monitoring log, raw ground – case ready Log, batch sheet and pallet verification sheet, outbound trailer inspection for dated 6/25-27/2019, carcasses E.coli testing form, carcasses Salmonella testing form, Annual thermometer (HACCP) calibration for certified thermometer was conducted 3/26/2019, annual Tel-Tru calibration 4/30/2019, daily thermometers verifications were reviewed - 6/4-9/2019, daily HACCP thermometer calibration (based on use) 6/24-27/2019, annual production scale calibration were reviewed - 3/21/18, daily scales verification were reviewed - 2/4-9/19, annual metal detector calibration – 10/25/2018, daily metal detectors verification records were reviewed - 6/4-9/2019, Records for cleaning and related tasks were reviewed for; daily, cleaning verification, daily chemical concentration for foot baths, daily facility – weeks of 5/12, 19, 5, 15, 19, 26/2019 and 6/2, 9, 16,23/2019, daily QA pre-operational inspection were reviewed for dates of 6/17-21/2019. Weekly sanitation verification test results were reviewed for 6/16, 24/2019. Weekly chemical product inventory and chemical product dispenser were reviewed for 6/10/19, 6/17/19 and 6/24/19. Chemical concentration verifications (titration/strip test) were reviewed for 6/1-26/2019.			
2.3.1 Product Development and Realization	2.3.1.1	Compliant	
	2.3.1.2	Compliant	
	2.3.1.3	Compliant	
	2.3.1.4	Compliant	
	2.3.1.5	Compliant	
Section Summary: The facility has in place a corporate Research and Development Plan (New Product Startup Procedure) and Product Development, Realization Procedure and New and Changed Product Process managed by Corporate R&D. The plan includes procedures and policies to design, develop and converting product to commercial realization. The program covers the methods and responsibilities for designing, developing, testing and running new or redesigned products and includes the methods and responsibilities to review and validate food safety and product quality criteria for new products. QA staff is responsible for reviewing the product for food safety issues and to document any changes or additions in the HACCP Plan prior to conduct new product trials and managing the production of the plant trial. The program includes product formulation, plant trials, shelf-life testing (sensory, physical and microbiological), transportation testing, nutritional information, label /ingredients review, packaging material validation and verification of food safety and food quality plans and shelf life validation. The new product review includes product identification, description, product specifications, label review, regulatory compliance check, customer requirement check, food safety, product quality verifications and plant implementation. New products development records (New product Checklist) were reviewed for a new product approved 3/21/19 with a first run (New Product Run Checklist) conducted 5/22/19.			
2.3.2 Raw and Packaging Materials	2.3.2.1	Compliant	
	2.3.2.2	Compliant	
	2.3.2.3	Compliant	
	2.3.2.4	Compliant	
	2.3.2.5	Compliant	
	2.3.2.6	Compliant	
	2.3.2.7	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Guidelines for raw materials (live stock), ingredients and packaging material specifications were outlined in the Raw and Packaging Materials Policy – 2/6/18. Raw, ingredients and packaging materials specifications were on file in computer database systems (packaging iCix and ingredients ISYS). Raw and ingredients are validated through COA's and Letters of Guarantee and Certificate of Conformance issued by the suppliers. A procedure for validating ingredients, packaging materials and labels was in place managed by the corporate office. Ingredient specifications were reviewed for dextrose, liquid smoke and corn syrup. Per the CQP1, label verification, finished product label information includes regulatory information, weight limits, ingredient statement, nutritional information and product name. Label verification guidelines are outlined in the Labeling and Code Date Verification Procedure and in the Product Label Approval.			
2.3.3 Contract Service Providers	2.3.3.1	Compliant	
	2.3.3.2	Compliant	
Section Summary: Specifications and training for contract services is managed by QA Manager. Specifications were outlined in the Contractor Management Program and Contractor Handbook under General Procedure for Contractors – 11/6/2018. A Facility Specific Contractor Services Providers Register was on file.			
2.3.4 Contract Manufacturers	2.3.4.1	Not Applicable	
	2.3.4.2	Not Applicable	
	2.3.4.3	Not Applicable	
Section Summary: Co-packers are not used by this facility. This is a corporate responsibility.			
2.3.5 Finished Product Specifications	2.3.5.1	Compliant	
	2.3.5.2	Compliant	
Section Summary: Documented finished product specifications were on file and current managed by a company electronic Web-based system (ISYS). Finished product specifications and labels were reviewed for Pork Chops and for Microwave Bacon. The finished product specification register is part of the product database system. Finished product specifications are developed based on customer requirements, and based on regulatory, food safety and product quality company requirements.			
2.4.1 Food Legislation	2.4.1.1	Compliant	
	2.4.1.2	Compliant	
	2.4.1.3	Compliant	
Section Summary: The Facility Food Safety Manager and Quality Assurance Manager are responsible to maintain the plant staff aware regarding regulatory requirements. The Corporate Compliance Manager is responsible to maintain the facilities up to date regarding regulatory/legal, product quality innovations, food safety trends, industry updates. Label legal requirements are verified by the corporate office, with guidelines outlined in the Labeling and Code Date Verification Procedure and in the Product Label Approval. This requirement to SQFI and the certification body is covered in the Product Withdrawal/Recall Program under the Crisis Management Program.			
2.4.2 Good Manufacturing Practices	2.4.2.1	Compliant	
	2.4.2.2	Compliant	
Section Summary: Good Manufacturing Practices (GMPs for Personnel – 2/4/19) were documented, implanted and communicated to employees during new hire orientation, annual training or as needed. GMPs included personal hygiene, dress code, general housekeeping practices, training sessions, allergen awareness, practices verification and blood-borne pathogens training. Employees were observed following GMP established by the facility.			
2.4.3 Food Safety Plan	2.4.3.1	Compliant	
	2.4.3.2	Compliant	
	2.4.3.3	Compliant	
	2.4.3.4	Compliant	
	2.4.3.5	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	2.4.3.6	Compliant	
	2.4.3.7	Compliant	
	2.4.3.8	Compliant	
	2.4.3.9	Compliant	
	2.4.3.10	Compliant	
	2.4.3.11	Compliant	
	2.4.3.12	Compliant	
	2.4.3.13	Compliant	
	2.4.3.14	Compliant	
	2.4.3.15	Compliant	
	2.4.3.16	Compliant	
	2.4.3.17	Compliant	

Section Summary: The facility (Est. – M-221A/P-9932), HACCP Team with members from Operations, Production, Food Safety and QA have developed, implemented and maintain a Food Safety Program that includes five HACCP Plans: HACCP 1 – Swine Slaughter Operation (2/25/19) with two CCPs (CCP1) Zero Tolerance (carcass visible contamination with milk/fecal/ingesta), reviewing 13 carcasses per hour documented in the Zero Tolerance CCP Record and CCP2 – Pathogen Control (Salmonella) by acid PAA Spay at 140 ppm – 300 ppm, observing 13 carcasses per hour documented in the PAA (peroxyacetic) Concentration, Titration and Coverage Form; HACCP 2 - Raw Not Ground Pork Products (2/22/19)with two CCPs, CCP1 – Equalization/Chilling (chilled internal temperature at < 48F previous to carcasses cut), verifying 20 carcasses, documented in the Carcass Temperature Log, CCP2 Temperature Verification Checks at < 48 after mixing, documented in the Blending Temperature Log; HACCP 3 – Not Heat Treated, Shelf Stable (6/10/19) – Dry Cured Hams with no CCPs; HACCP 4 – Heat Treated, Not Fully Cooked, Not Shelf Stable and Heat Treated, Not Fully Cooked, Shelf Stable (6/10/19) – Cured and Smoked Pork Products/Turkey Smoked Legs with one CCP, CCP1 – Product Chilling (hams -chill form 130F to 80F or below in <5 hours and 80F to 45F or below in < 10 hours, cured, bacon – chill from 120F to < 45F within 6 hours, uncured products – chill from 130F to 80 or below in 1.5 hours and 80F to 40F or below in < 5 hours; HACCP 5 – Heat Treated, Fully Cooked, not Shelf Stable and Heat Treated, Fully Cooked, Shelf Stable (7/9/18) – RTE Microwave Bacon, Bacon Toppings, Bacon Bits with one CCP, CCP1 – Thermal Process at 160F oven temperature per Appendix A for 1 temperature check for each line per every hour, documented I the Temperature Log. The five plans include product Descriptions, process description, ingredients hazard analysis, process hazard analysis specific process flow for each process, CCPs Master Chart, HACCP Revision History Chart, HACCP Reassessment Form, pre-requisites, supporting plat programs and USDA/FSIS supporting directives. The scope, level of certification and items produced were included in the Food Safety Plan, as well as support program and pre-requisite processes. CCP records were reviewed for dates of 2/11-14/19, 4/15-18/19 and 6/17-20/19.

2.4.4 Approved Supplier Program	2.4.4.1	Compliant	
	2.4.4.2	Compliant	
	2.4.4.3	Compliant	
	2.4.4.4	Compliant	
	2.4.4.5	Compliant	
	2.4.4.6	Compliant	
	2.4.4.7	Compliant	
	2.4.4.8	Compliant	
	2.4.4.9	Compliant	
	2.4.4.10	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Raw material (live stock from company owned farms) ingredients, packaging materials, chemical products and service providers are purchased from pre-approved suppliers only, approved by corporate office. Suppliers are approved base on food safety and quality requirements, compliance with FDA and USDA, according to a quality supplier risk analysis/raw material hazard analysis and customer product specifications requirements. The QA and Production Manager are responsible for the supplier approval program. Guidelines for this program are documented in the Vendor Compliance Requirements. A current Approved Supplier register was on file in a corporate intranet database system and printed version. The register included raw materials (protein), ingredients, packaging material, chemical products and services. Suppliers are monitored though annual 3rd party audits and company visits and by compliance to requirements. The supplier approval program includes meat vendors (pork, beef and poultry), non-meat vendors (ingredients) and packaging, casing and netting.			
2.4.5 Non-conforming Product or Equipment	2.4.5.1	Compliant	
	2.4.5.2	Compliant	
Section Summary: The monitoring and control for non-conforming/on-hold product and equipment procedures area implemented and documented in the Product Retention Policy. The procedure applies to non-conforming product due to not meeting customer requirements, regulatory requirements, food safety and quality standards. The non-conforming product is tagged with the hold date, product description and moved to the designated hold area as required. The QA area is responsible for releasing non-conforming product. This procedure applies to raw material, packaging material, finished product, returned product and non-conforming equipment. Non-conforming/On-hold product is recorded in the Hold Tag Tracking Log and/or in a Company Computer Based System (SAP) or in a inventory control (ROC) based on the severity of the defect/deviation. Records include Item, Product Description, Status, Pallet ID, Production Date, Expiration Date, Sell By Date, Put on hold Date, Type of non-conformance, Disposition, Disposition Date, Reason and Responsible. Records for product on-hold due to quality requirements and due to product deviation were on file.			
2.4.6 Product Rework	2.4.6.1	Compliant	
	2.4.6.2	Compliant	
Section Summary: The responsibility and methods explaining how product is reworked is outlined in the Refrigerated Rework Age Usage Limits Procedure – 6/4/19. Product rework applies to grinding process or product re-packed during production or finished product for like-to-like products only, at 5%, not exceeding 5 days for raw product and 6 months for frozen products. Procedures are documented in the Raw Material and WIP Age Limit, Repacking Finished Product and Rework Control Procedure – 1/9/2018. Rework product records were reviewed for the days of the audit (6/25-27/2019).			
2.4.7 Product Release	2.4.7.1	Compliant	
	2.4.7.2	Compliant	
Section Summary: Product release is managed by the Control of Non- Conforming Products and Hold – 2/6/18 Procedure. Product release is based on Food Safety, Quality (facility and customer standards) and Legal Requirements compliance verification conducted by QA and recorded in the Pre-shipment Verification Form, Scale Log Formulation Sheet/CQP, CCP verification log. Product release records (Pre-shipment forms) were reviewed for 6/25-27/2019.			
2.4.8 Environmental Monitoring	2.4.8.1	Compliant	
	2.4.8.2	Compliant	
	2.4.8.3	Compliant	
	2.4.8.4	Compliant	
Section Summary: The facility had implemented and maintains an Environmental Monitoring Plan for the RTE Product Lines and Areas (12/5/2018), based on product and area/equipment risk assessment conducted by QA. The plan including food contact and non-food contact surfaces testing. The QA/FS Team is responsible for maintaining and executing the plan. The plan requires testing for Listeria spp. 9 sites per day (3 sites from food contact, 2 employee gloves, 3 sites from non-contact, 1 exploratory sample, testing a minimum of 50 ml. of brine solution and 20% of drains). The swabs are collected after two hours of producing. Corrective actions in case of presuming positives deep cleaning and tear down practices are included in the Plan. Testing results are recorded in the Environmental Monitoring Summary.			
2.5.1 Validation and Effectiveness	2.5.1.1	Compliant	
	2.5.1.2	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Verifications and validations guidelines for pre-requisites, support programs and CCP/CQP monitoring practices are outlined in the SQF Verification and Validation Schedule. The schedule includes methods, frequencies, scheduling and responsibilities for Verification and Validation conducted by the SQF Practitioner. Annual validations were reviewed for HACCP Plan – 6/10/19, Product Quality Program – 6/10/19, Water Potability – 5/2/19, SQF Documentation – 3/26/19, Sanitation Program – 3/26/19, Pre-operational RODA Program – 3/19/19, Thermometer Calibration Program – 3/31/19, CCP and CQP Monitoring Practices – 6/10/19. Validations task are documented in the Food Safety / Product Quality Support Program Chart .			
2.5.2 Verification Activities	2.5.2.1	Compliant	
	2.5.2.2	Compliant	
	2.5.2.3	Compliant	
Section Summary: Verifications and validations guidelines for pre-requisites, support programs and CCP/CQP monitoring practices are outlined in the SQF Verification and Validation Schedule. The schedule includes methods, frequencies, scheduling and responsibilities for Verification and Validation conducted by the SQF Practitioner. Weekly documentation and monitoring practices were reviewed for CCP-zero tolerance, carcasses temperature, microwave thermal process, carcass E.coli/Salmonella sampling , peracetic acid titration, thermometer calibration, metal detection for dates 5/30-31/2019.			
2.5.3 Corrective and Preventative Action	2.5.3.1	Compliant	
	2.5.3.2	Compliant	
Section Summary: The corrective actions needed in case a product deviation occurs at the Food Safety Critical Control Points (CCPs) and CQP level and the person responsible for each activity is implemented and stated in the HACCP plan hazard analysis and Quality Plan hazard analysis summary sheets. Corrective action responsibility and methods are also outlined in the Corrective Actions Policy and Control of Non-conforming Product and Hold Procedure. Corrective action records were reviewed for pre-operational Inspection conducted 6/17-21/2019, customer complaints reported 6/11, 14, 17, 81/2019, internal audit conducted 3/25-28/2019.			
2.5.4 Product Sampling , Inspection and Analysis	2.5.4.1	Compliant	
	2.5.4.2	Compliant	
	2.5.4.3	Compliant	
	2.5.4.4	Compliant	
Section Summary: The Product Sampling , Inspection, and Analysis procedures based on the type of sample and level of process are outlined in the Receiving of Non-Meat Ingredients, Receiving of raw Materials and Finished Goods, Controlled Labeling and Code Date Verification, Control of Pumped Fresh Meat Products, Carcass E.coli Sampling Program, Carcass Salmonella Testing Program, CEM Fat Analysis Program, Standard Weigh Control. Testing is conducted at the certified corporate company laboratory by trained laboratory technicians. Sampling records are maintained by the laboratory staff in a computer database.			
2.5.5 Internal Audits and Inspections	2.5.5.1	Compliant	
	2.5.5.2	Compliant	
	2.5.5.3	Compliant	
	2.5.5.4	Compliant	
	2.5.5.5	Compliant	
Section Summary: Internal audits guidelines are documented in the Internal Facility Audis Procedure – 2/06/2018. The program includes an Annual SQF System based (food safety/Quality) audit conducted by the FS/QA corporate office and a monthly GMP/Food Safety Audit conducted by facility management personnel lead by the SQF Practitioner. Auditors conducting the audits are from different areas of the facility and trained by the SQF Practitioner. Audit reports included findings, corrective actions, investigations, due dated, completion dates, responsible to complete the task and non-conforming issue training . Records and corrective action were reviewed the Internal SQF Annual Audit conducted 3/25-28/2019.			
2.6.1 Product Identification	2.6.1.1	Compliant	
	2.6.1.2	Compliant	
	2.6.1.3	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: The methods and responsibility for identifying and track products during all stages of production and storage are documented in the Product Identification and Product Trace Procedures – 2/6/2018, Trace and Recall Program. Paperwork containing product identification and traceability information were reviewed for receiving /shipping, dry ingredient receiving, spice tracking and verification form, finished product shipping records, product analysis, carcass monitoring log, variety meats monitoring log, raw ground – case ready Log, marination batch sheet and pallet verification sheet, outbound trailer inspection for dated 6/25-27/2019.			
2.6.2 Product Trace	2.6.2.1	Compliant	
	2.6.2.2	Compliant	
Section Summary: The methods and responsibility for identifying and track products during all stages of production and storage are documented in the Product Identification and Product Trace Procedures – 2/6/2018, Trace and recall. Raw material, ingredients and packaging is identified lot number, pallet tags. Finished products are identified by lot number and production dates or by specific customer requirements. The facility conducted a mock recall on 9/29/2018 for 72 cases of Ascorbic Acid, product number 57128, producer lot number 170132002, received 6/26/2018. The ingredient was used to process several products. Production records of finished product for all affected finished products (124,835 cases) were accounted for 100% within one hour, including other ingredients and packaging material.			
2.6.3 Product Withdrawal and Recall	2.6.3.1	Compliant	
	2.6.3.2	Compliant	
	2.6.3.3	Compliant	
	2.6.3.4	Compliant	
	2.6.3.5	Compliant	
Section Summary: A Recall program is documented in the Crisis Management Plan. The program is managed by the corporate office and facility management teams. The Recall Program includes responsibilities for the recall team, corporate sources of legal advice, communication channels for customers, consumers, regulatory agencies, recall /withdrawal procedures, mock recall policy, certification body. Based on the Recall Program, the facility conducts a minimum of four recalls per year and several as a request during 3rd audits. During the audit the QA Manager and Plant Controller conducted a mock recall for 1332 cases (30969 lbs) of Bacon (BACN RSTD PK 8PKGS 640 CT), item number 1007080004943, lot number 9309912931, produced 5/9/19, shipped 5/9-10/2019 to a freezer warehouse. The product was processed from pressed product numbers 31884 batch 912192131, kill dates 4/2, 29/19 and 5/2/19 and 31890 batch 9123912331, kill dates 4/24, 30/19 and 5/1/19. The finished product, raw material, packaging and destination were identified and traced 100% within one hour.			
2.7.1 Food Defense Plan	2.7.1.1	Compliant	
	2.7.1.2	Compliant	
	2.7.1.3	Compliant	
	2.7.1.4	Compliant	
Section Summary: A facility specific and a Corporate Food Defense (Food Security Plan – 1/4/2018) plan were developed and implemented outlining the requirements of this section for external security services, internal food security audits, background checks, raw material security, access to the facility/visitor policy, employee security, building security, transportation security measures for receiving and shipping of food products and continuous improvement of food security. Food Defense Program is led by the Plant Manager and a Food Security Team. During the audit, the interior and exterior areas were observed secured. No doors were left open and unattended. The facility has security protocols for visitors implemented. Employees are background checked before being hired. Guidelines for the inspection of LTLs is implemented and documented. The facility requires for all truck driver to be identify. Truck seals were recorded in the inbound truck inspection. The plan was reassessed 3/27/19 by the Corporate Office Security Team and Facility Management Team. The facility conducts a Venerability Evaluation (USDA/FISI – Industry Self-Assessment Checklist for Food Security) on 4/18/18. The plan was challenged by the Security Team on 12/13/18. The drill was documented in the Annual Internal SQF Audit conducted 3/25-28/2019. The drill demonstrated the effectiveness of the Program.			
2.7.2 Food Fraud	2.7.2.1	Compliant	
	2.7.2.2	Compliant	
	2.7.2.3	Compliant	
	2.7.2.4	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: A Corporate Self Assessment on Food Fraud Vulnerability was conducted on 11/20/18. The assessment included all ingredients, packaging, labels, and protein suppliers for fresh meat and packaged meats including hog suppliers/growers. The plan outlines the plant and corporate staff responsibilities for supplier product evaluations and risk assessment implementation based on product and supplier risk level. The plant receives the majority of the raw materials from company owned plants/distribution centers. The risk vulnerability assessment and mitigation conducted 11/20/2018 is based on country of origin, supplier reputation/history, product type, product composition, delectability technology, methods for adulteration, internal controls.			
2.8.1 Allergen Management for Food Manufacturing	2.8.1.1	Not Applicable	
	2.8.1.2	Not Applicable	
	2.8.1.3	Not Applicable	
	2.8.1.4	Not Applicable	
	2.8.1.5	Not Applicable	
	2.8.1.6	Not Applicable	
	2.8.1.7	Not Applicable	
	2.8.1.8	Not Applicable	
	2.8.1.9	Not Applicable	
	2.8.1.10	Not Applicable	
	2.8.1.11	Compliant	The facility has an Allergen Control and Awareness Plan that includes supplier requirements for allergen control procedures and employee awareness training.
Section Summary: The facility has an Allergen Control and Awareness Plan that includes supplier requirements for allergen control procedures and employee awareness training.			
2.8.2 Allergen Management for Pet Food Manufacturing	2.8.2.1	Not Applicable	
	2.8.2.2	Not Applicable	
Section Summary: The facility does not process pet food products.			
2.8.3 Allergen Management for Manufacturers of Animal Feed	2.8.3.1	Not Applicable	
	2.8.3.2	Not Applicable	
Section Summary: The facility does not process animal feed products.			
2.9.1 Training Requirements	2.9.1.1	Compliant	
	2.9.1.2	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Employees (HACCP Team/QA Staff) dedicated to maintain the Food Safety/HACCP Plan are annually trained regarding Food Safety responsibilities, product specifications, labeling and code dating, regulatory requirements, document management solution system, CCPs monitoring requirements, USDA requirement.			
2.9.2 Training Program	2.9.2.1	Compliant	
Section Summary: A documented training program (Food Safety and Quality Employee Training - 1/18/19) was in place outlining the training competencies and needs. The program includes training Requirement, New Hire Orientation Training, Annual Refresher Training, and Job Specific Training. The training includes GMP, HACCP/CCP/CQP, Metal Detection, Pre-Operational Practices, Swabbing Techniques, SQF, Pre-requisites and specific job related responsibilities. The training is maintained in a Computer Based System (Qualtrax).			
2.9.3 Instructions	2.9.3.1	Compliant	
Section Summary: Job specific Instructions explaining how all tasks to meet product specifications, maintenance of food safety, quality and process were available to all employees.			
2.9.4 HACCP Training Requirements	2.9.4.1	Compliant	
Section Summary: Employees (HACCP/Product Quality Team/QA Staff) dedicated to maintain the Food Safety/HACCP Plan are annually trained regarding Food Safety responsibilities, product specifications, product quality testing, labeling and code dating, regulatory requirements, document management solution system, CQPs monitoring requirements, USDA requirement.			
2.9.5 Language	2.9.5.1	Compliant	
Section Summary: Training materials and the delivery of training is provided in language (English and Spanish) as needed.			
2.9.6 Refresher Training	2.9.6.1	Compliant	
Section Summary: Annual Refresher Training, and Job Specific Training was reviewed for GMP /SSOP-4/12/19, HACCP – 4/12/19, /CCP/CQP monitoring – 3/18/19, metal detection practices – 4/25/19, allergen control awareness - 4/25/19, pre-operational practices- 4/12/19, regulatory requirements- 3/18/19, label verification checks – 4/23/19, SQF and specific job related responsibilities – 4/25/19. The training is maintained in a Computer Based System by the QA Manager.			
2.9.7 Training Skills Register	2.9.7.1	Compliant	
Section Summary: A training register for general training and job specific skills was on file and current in a company database system for 2019 training period.			
9.1.1/11.1.1 Premises Location	9.1.1.1/11.1.1.1	Compliant	
Section Summary: The facility is not surrounded by building and there were no issues observed that could interfere with the safe and hygienic operations.			
9.1.2/11.1.1 Premises Location	9.1.2.1/11.1.1.2	Compliant	
Section Summary: The exterior of the facility was well maintained. An exterior environmental risk was conducted by the QA team. Facility inspections are performed monthly.			
9.1.2/11.1.2 Construction and Operational Approval	9.1.2.1/11.1.2.1	Compliant	
Section Summary: The facility maintains on file a Grant of Inspection from the U.S. Department of Agriculture – Est.-18079. The grant was dated 2/526/2019.			
9.2.1 Housing of Livestock	9.2.1.1	Compliant	
	9.2.1.2	Compliant	
	9.2.1.3	Compliant	
	9.2.1.4	Compliant	
	9.2.1.5	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Pens, barns areas and live stock path are designed so as to minimize stress and injury for the animals. The pens and yards were free from paints, dips, or chemical product that cloud cause contamination through ingestion, inhalation, or contact. The barn was observed to be in sanitary and clean conditions. The lane-ways, entrances, exits and loading/unloading ramps were designed following animal welfare standards. During the direct observation employees were following animal welfare practices. Daily Human Handling Transportation Audit Forms were reviewed for 6/17-21/2019. The audit reviews plant transportation, live stock receiving practices, loading/alignment of truck, animal unloading practices, timing of delivering, animal conditions before unloading, animal conditions, at the pens, and animal handling employee practices.			
9.2.2/11.2.1 Materials and Surfaces	9.2.2.1/11.2.1.1	Compliant	
Section Summary: Product contact surfaces are constructed of materials that do not pose a food safety or food quality risk.			
9.2.3/11.2.2 Floors, Drains and Waste Traps	9.2.3.1/11.2.2.1	Compliant	
	9.2.3.2/11.2.2.2	Compliant	
	9.2.3.3/11.2.2.3	Compliant	
	9.2.3.4/11.2.2.4	Compliant	
Section Summary: Floors were well maintained and constructed of materials specific for food processing plants. Floors were graded to drain the water directly to drains located in specific areas to avoid contamination.			
9.2.4/11.2.3 Walls, Partitions, Doors and Ceilings	9.2.4.1/11.2.3.1	Compliant	
	9.2.4.2/11.2.3.2	Compliant	
	9.2.4.3/11.2.3.3	Compliant	
	9.2.4.4/11.2.3.4	Compliant	
	9.2.4.5/11.2.3.5	Compliant	
	9.2.4.6/11.2.3.6	Compliant	
	9.2.4.6/11.2.3.7	Compliant	
Section Summary: Ceilings, walls, pipes and ducts were observed constructed with durable materials, well maintained and in good conditions and did not represent a product risk.			
9.2.5/11.2.4 Stairs, Catwalks and Platforms	9.2.5.1/11.2.4.1	Compliant	
Section Summary: Stairs and platforms in food processing areas do not pose a risk to product contamination. Stairs and platforms were observed in good conditions, clean and with protection to prevent product contamination.			
9.2.6/11.2.5 Lighting and Light Fittings	9.2.6.1/11.2.5.1	Compliant	
	9.2.6.2/11.2.5.2	Minor	Minor – Two light fixture covers were observed broken above the RTE Room.
	9.2.6.3/11.2.5.3	Compliant	
Section Summary: Minor – Two light fixture covers were observed broken above the RTE Room. Light intensity was appropriate in all areas of the plant. Light in processing, handling or storing areas were protected or shatterproof.			
9.2.7/11.2.6 Inspection/Quality Control Area	9.2.7.1/11.2.6.1	Compliant	
	9.2.7.2/11.2.6.2	Compliant	
Section Summary: Product inspection areas are performed of material appropriate for the purpose. All inspection areas observed were well equipped for the specific sampling conducted and well lighted.			
9.2.8/11.2.7 Dust, Insect, and Pest Proofing	9.2.8.1/11.2.7.1	Compliant	
	9.2.8.2/11.2.7.2	Minor	Minor – Dock doors 22 and 23 had openings at the bottom corners due to missing seal or brushes. Dock door 29 was left opened.

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	9.2.8.3/11.2.7.3	Compliant	
	9.2.8.4/11.2.7.4	Compliant	
Section Summary: Minor – Dock doors 22 and 23 had openings at the bottom corners due to missing seal or brushes. Dock door 29 was left opened. Windows, ventilation openings, external doors, receiving overhead doors and other openings were observed with good seal and closed during the audit. All electrical inspect traps were well positioned so they do not present a contamination risk to product, packaging, containers or processing equipment.			
9.2.9/11.2.8 Ventilation	9.2.9.1/11.2.8.1	Compliant	
	9.2.9.2/11.2.8.2	Compliant	
	11.2.8.3	Compliant	
	9.2.9.3	Compliant	
Section Summary: Ventilation fans were located in several areas in the processing room. The facility does not have production areas that require exhaust fans.			
9.2.10/11.2.9 Equipment, Utensils, and Protective Clothing	9.2.10.1/11.2.9.1	Compliant	
	9.2.10.2/11.2.9.2	Minor	Minor – A clock plastic cover was broken with missing pieces above the Kill Office door.
	11.2.9.3	Compliant	
	9.2.10.3	Compliant	
	9.2.10.4/11.2.9.4	Compliant	
	9.2.10.5/11.2.9.5	Compliant	
	9.2.10.6/11.2.9.6	Compliant	
	9.2.10.7/11.2.9.7	Compliant	
	9.2.10.8/11.2.9.8	Compliant	
Section Summary: Minor – A clock plastic cover was broken with missing pieces above the Kill Office door. Food processing and food handling equipment is hygienically designed for the manufacture of safe food, is easily cleaned in place or dismantled for cleaning out of place and did not pose a food safety risk. Water used for processing and equipment cleaning was discharged to the floor drains. Water accumulation was not observed.			
9.2.11/11.2.10 Premises and Equipment Maintenance	9.2.11.1/11.2.10.1	Compliant	
	9.2.11.2/11.2.10.2	Minor	Minor – Loose screws were observed on a plastic wall cover next to an ice storage tote.
	9.2.11.3/11.2.10.3	Compliant	
	9.2.11.4/11.2.10.4	Compliant	
	9.2.11.5/11.2.10.5	Compliant	
	9.2.11.6/11.2.10.6	Compliant	
	9.2.11.7/11.2.10.7	Compliant	
	9.2.11.8/11.2.10.8	Compliant	
	9.2.11.9/11.2.10.9	Minor	Minor – A non-food contact tool was left inside a food container. The tool (wrench) had the handle cover broken.
	9.2.11.10/11.2.10.10	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	9.2.11.11/11.2.10.11	Compliant	
Section Summary: Minor – Loose screws were observed on a plastic wall cover next to an ice storage tote. Minor – A non-food contact tool was left inside a food container. The tool (wrench) had the handle cover broken. A computer data-based (SAP) planned maintenance schedule/program is implemented. Maintenance records were on file and up to date. The program includes a preventive and emergency maintenance program that covers equipment and building areas. The work orders include the sign off for control and cleaning of tools, sanitation of the area, and release of area to the production group. The Maintenance Food Safety guidelines address the protection or disposition of product affected by maintenance activities. Same guidelines describe the equipment sanitation, tools and parts retrieval after maintenance activities. The facility uses only food grade lubricants for food processing equipment. During the audit the facility equipment was observed well maintained and equipment was observed in good repair during the audit.			
9.2.12/11.2.11 Calibration	9.2.12.1/11.2.11.1	Compliant	
	9.2.12.2/11.2.11.2	Compliant	
	9.2.12.3/11.2.11.3	Compliant	
	9.2.12.4/11.2.11.4	Compliant	
	9.2.12.5/11.2.11.5	Compliant	
	9.2.12.6/11.2.11.6	Compliant	
Section Summary: Laboratory and processing equipment calibration procedures are documented in the thermometer calibration procedures, scales calibration procedures, metal detector verification policy. Calibrations is conducted based on manufacturer specifications or based on equipment use frequency. Annual thermometer (HACCP) calibration for certified thermometer was conducted 3/26/2019, annual Tel-Tru calibration 4/30/2019, daily thermometers verifications were reviewed - 6/4-9/2019, daily HACCP thermometer calibration (based on use) 6/24-27/2019, annual production scale calibration were reviewed - 3/21/18, daily scales verification were reviewed - 2/4-9/19, annual metal detector calibration – 10/25/2018, daily metal detectors verification records were reviewed - 6/4-9/2019. Policies for the segregation of affected product tested or verified with defective equipment id outlined in the equipment calibration Policy.			
9.2.13/11.2.12 Pest Prevention	9.2.13.1/11.2.12.1	Compliant	
	9.2.13.2/11.2.12.2	Compliant	
	9.2.13.3/11.2.12.3	Compliant	
	9.2.13.4/11.2.12.4	Compliant	
	9.2.13.5/11.2.12.5	Compliant	
	9.2.13.6/11.2.12.6	Compliant	
Section Summary: The facility maintains a Pest Control Program – 1/28/2019 that includes a third party pest control company, internal pest control practices and management responsibilities. The program covers PCO responsibilities and facility staff pest control responsibilities, inspection frequency (weekly for internal and external areas) for inside insect devises and exterior rodent bait stations and methods for pest control. The pest control program includes target pest, pest control trap map – 7/9/2018, authorized product list, annual facility assessment, products SDS, pest control awareness training, PCO training documentation, pest control inspector and company license with an expiration date of 3/31/2020, certificate of liability, target pest and methods to control/prevent pest issues. Weekly inspections for insects and rodents are performed by trained. Inspection's records were reviewed for 5/3, 8, 17/2019 and 6/6, 13, 20/2019, pest activity trend were reviewed for period of 2019 1st quarter. All records reviewed were up to date and complete. The facility does not store pesticides or other toxic chemicals on site.			
9.2.13/11.2.13 Pest Prevention	9.2.13.7/11.2.12.7	Not Applicable	
Section Summary: Pesticides and other toxic chemicals are not stored inside the plant.			
9.2.13/11.2.14 Pest Prevention	9.2.13.8/11.2.12.8	Compliant	
Section Summary: Pest control company and employee licenses were on file and up to date with expiration date on 3/310/2020. A pest control trap map revised 7/9/2018 was on file and included all observed pest control traps.			
9.2.13/11.2.15 Pest Prevention	9.2.13.9/11.2.12.9	Not Applicable	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Pest control chemicals are not handled by the facility staff.			
9.2.14/11.2.13 Cleaning and Sanitation	9.2.14.1/11.2.13.1	Compliant	
	9.2.14.2/11.2.13.2	Minor	Minor – An exhaust fan screen above an ice tote was observed dirty with dust buildup.
	9.2.14.3/11.2.13.3	Compliant	
	11.2.13.4	Compliant	
	9.2.14.5/11.2.13.6	Compliant	
	9.2.14.6/11.2.13.7	Compliant	
	9.2.14.7/11.2.13.8	Compliant	
	9.2.14.8/11.2.13.9	Compliant	
	9.2.14.9/11.2.13.10	Compliant	
Section Summary: Minor – An exhaust fan screen above an ice tote was observed dirty with dust buildup. A documented Cleaning and Sanitation Plan (General Sanitation Procedures) for wet and dry cleaning was implemented and maintained by facility the Sanitation Manager and Sanitation Staff. The sanitation cleaning tasks are conducted by an external cleaning company staff the third shift. The sanitation plan included employee training (food safety, GMP's, sanitation practices, chemical handling), equipment and facility areas SSOP's (product needed, chemical dilution verification, cleaning/sanitizing instructions, cleaning frequency, water temperature), chemical concentration verification, pre-operational practices guidelines, cleaning equipment color code, chemical SDS, product chemical inventory, empty container disposal procedures, cleaning verifications with RODAC plates (< 25 cfu/mL per plate is good, 26 – 50 cfu/mL per plate is fair, > 50 cfu/mL is poor – requires re-cleaning and corrective actions). Records for cleaning and related tasks were reviewed for; daily, cleaning verification, daily chemical concentration for foot baths, daily facility – weeks of 5/12, 19, 5, 15, 19, 26/2019 and 6/2, 9, 16,23/2019, daily QA pre-operational inspection were reviewed for dates of 6/17-21/2019. Weekly sanitation verification test results were reviewed for 6/16, 24/2019. Weekly chemical product inventory and chemical product dispenser were reviewed for 6/10/19, 6/17/19 and 6/24/19. Chemical concentration verifications (titration/strip test) were reviewed for 6/1-26/2019.			
9.2.14/11.2.14 Cleaning and Sanitation	9.2.14.4/11.2.13.5	Compliant	
	9.2.14.10/11.2.13.11	Compliant	
Section Summary: Pre-operational inspections are conducted by QA Staff covering all areas of the plant based on a pre-set schedule. Daily pre-operational inspections records were reviewed for 6/17-21/2019.			
9.3.1/11.3.1 Personnel	9.3.1.1/11.3.1.1	Compliant	
	9.3.1.2/11.3.1.2	Compliant	
	9.3.1.3/11.3.1.3	Compliant	
Section Summary: A documented GMP program was in place and documented. The program includes personal hygiene, glove use, hand washing practices, dress code, food safety and processing/handling practices. Employees were observed following established GMPs.			
9.3.1/11.3.2 Personnel	9.3.1.4/11.3.1.4	Minor	Minor – Candy wrapping and a beverage plastic bottle was observed inside the PAA Room.
Section Summary: Minor – Candy wrapping and a beverage plastic bottle was observed inside the PAA Room.			
9.3.2/11.3.2 Hand Washing	9.3.2.1/11.3.2.1	Compliant	
	9.3.2.2/11.3.2.2	Compliant	
	9.3.2.3/11.3.2.3	Compliant	
	9.3.2.4/11.3.2.4	Compliant	
	9.3.2.5/11.3.2.5	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	9.3.2.6/11.3.2.6	Compliant	
Section Summary: Hand-free hand wash stations made of stainless steel were located adjacent to the production area and at the entrance of the processing areas. The stations were equipped with hot/cold water, soap, paper towels and a waste container, hand wash signs.			
9.3.3/11.3.3 Clothing	9.3.3.1/11.3.3.1	Compliant	
	9.3.3.2/11.3.3.2	Compliant	
	9.3.3.4/11.3.3.3	Compliant	
	9.3.3.5/11.3.3.4	Compliant	
	9.3.3.6/11.3.3.5	Compliant	
Section Summary: Staff clothing in all area of the facility was observed clean and in good conditions. Glove use is included in the facility GMP policy, including hand washing before use of gloves. Glove and disposable protective equipment use guidelines are included in the facility GMP policy, including hand washing before use of gloves.			
9.3.3/11.3.4 Clothing	9.3.3.3	Compliant	
Section Summary: Personnel working at the RTE zone are required to used area specific PPE before entering the RTE zone. The practice was verified by observation of employees entering the area.			
9.3.4/11.3.4 Jewelry and Personal Effects	9.3.4.1/11.3.4.1	Compliant	
Section Summary: Employees in processing and non-processing areas were not observed wearing loose objects or jewelry.			
9.3.5/11.3.5 Visitors	9.3.5.1/11.3.5.1	Compliant	
	9.3.5.2/11.3.5.2	Compliant	
	9.3.5.3/11.3.5.3	Compliant	
	9.3.5.4/11.3.5.4	Compliant	
Section Summary: Per documented guidelines in the Visitor Policy, all visitors, including contractors, suppliers or company visitors must follow same GMP guidelines.			
9.3.5/11.3.6 Visitors	9.3.5.5/11.3.5.5	Compliant	
Section Summary: Visitor training material was provided at the plant entrance. The training material included GMP/Food Safety, employee safety and product safety practices.			
9.3.6/11.3.6 Staff Amenities	9.3.6.1/11.3.6.1	Compliant	
Section Summary: Employee welfare areas are supplied with adequate lighting, ventilation, dressing areas, and lockers for appropriate storage of personal items.			
9.3.7/11.3.7 Change Rooms	9.3.7.1/11.3.7.1	Compliant	
	9.3.7.2/11.3.7.2	Compliant	
	9.3.7.3/11.3.7.3	Compliant	
	9.3.7.4/11.3.7.4	Compliant	
Section Summary: All employees are provided with locker rooms to store their personal items. Change rooms are provided to all employees, including a separated change room for employees working in the slaughter area. Uniforms are cleaned by a 3rd party service provider.			
9.3.8/11.3.8 Laundry	9.3.8.1/11.3.8.1	Compliant	
Section Summary: Employee uniforms are cleaned by an external professional company.			
9.3.9/11.3.9 Sanitary Facilities	9.3.9.1/11.3.9.1	Compliant	
	9.3.9.2/11.3.9.2	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	9.3.9.3/11.3.9.3	Compliant	
Section Summary: Sanitary facilities were located separated from food processing and handling areas. The facilities were built in a way that does not represent a risk to the products. Hand wash sinks are provided inside toilet rooms and designed following requirements in section 11.3.2.2.			
9.3.10/11.3.10 Lunch Rooms	9.3.10.1/11.3.10.1	Compliant	
	9.3.10.2/11.3.10.2	Compliant	
	9.3.10.3/11.3.10.3	Compliant	
Section Summary: The lunch/break rooms are located in separated area away from processing and product storage/handling areas, well lighted and equipped with ventilation, hand wash sinks, refrigeration and heating facilities.			
9.3.10/11.3.11 Lunch Rooms	9.3.10.4/11.3.10.4	Compliant	
Section Summary: Hand wash instruction signage was available in English and Spanish at the cafeterias exits.			
9.4.1 Animal Husbandry	9.4.1.1	Compliant	
	9.4.1.2	Compliant	
	9.4.1.3	Compliant	
	9.4.1.4	Compliant	
	9.4.1.5	Compliant	
	9.4.1.6	Compliant	
Section Summary: Ante and post mortem inspections are conducted by USDA staff with assistant from facility barn trained employee. Animals slaughtered are from company owned farms and the company has the control to maintain animals free from prohibited substances according based on USDA requirements as well as PAACO guidelines. The site conducts farm approvals for non-owned animals through animal inspections and farms visits by company staff. The Live Tock Procurement Supervisor demonstrated competence in animal handling and welfare. The company has an animal welfare training program in place with annual training refreshers. Per policy, all animals deemed to be diseased or otherwise unfit for human consumption are segregated from wholesome animals and verified by USDA inspector and trained barn manager. Procedures are in place outlining the prevention of animal contamination from chemicals with agricultural or cleaning chemicals and or waste materials. Fresh clean water is continuously provided to the animals held in the barn. The barn was observed to be in sanitary and clean conditions. The lane-ways, entrances, exits and loading/unloading ramps were designed following animal welfare standards. During the direct observation employees were following animal welfare practices. Daily Human Handling Transportation Audit Forms were reviewed for 6/17-21/2019. The audit reviews plant transportation, live stock receiving practices, loading/alignment of truck, animal unloading practices, timing of delivering, animal conditions before unloading, animal conditions, at the pens, and animal handling employee practices. Pens, barns areas and live stock path are designed so as to minimize stress and injury for the animals. The pens and yards were free from paints, dips, or chemical product that cloud cause contamination through ingestion, inhalation, or contact.			
9.4.2 Slaughtering and Butchering	9.4.2.1	Compliant	
	9.4.2.2	Compliant	
	9.4.2.3	Compliant	
	9.4.2.4	Compliant	
	9.4.2.5	Compliant	
	9.4.2.6	Compliant	
	9.4.2.7	Compliant	
	9.4.2.8	Compliant	
	9.4.2.9	Compliant	
	9.4.2.10	Compliant	
	9.4.2.11	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Slaughtering methods used in this facility follows the North American Meat Institute and the Pork Council. Practices include animal handling practices training, inspections conducted by internal staff, stunning by CO2 and captive bolt killing process practices. USDA inspectors and company staff are in place to enforce this process. Daily Animal Welfare practices are documented in the Human Handling Plant Audit Form. The records include transportation vehicle conditions, animal handling employee practices, pen/barn conditions, procurement of drinking water, CO2 level %, killing practices by captive bolt, bleeding time. The slaughter HACCP plan assesses known biological hazards and demonstrates compliance to regulations or customer requirements for E. coli and Salmonella sampling of the carcass, documented in the Carcasses E. coli Sampling Form and in the Carcasses Salmonella Sampling Form. The Carcass Procedure covers the use of aseptic techniques, PAA ppm verifications, random selection, frequency, sampling technique, verification, specifications, corrective actions and investigation of non-conformance. Fecal matter is removed on the slaughter floor and the carcasses are inspected by USDA inspector and QA staff for signs of disease or contamination by fecal, milk or digesta as per the CCP monitoring requirement. There are procedures in place to identify the carcass primal cuts, edible and non-edible parts. All edible parts of the carcass are identified through processing and can be traced back to the carcass date and time of slaughter by killing time, date, farm, production code. Edible parts of the carcasses were processed using clean tools and equipment.			
9.4.3/11.4.1 Staff Engaged in Product Handling, Processing and Packaging Operations/Staff Engaged in Food Handling and Processing Operations	9.4.3.1/9.4.3.2/11.4.1.1	Compliant	
	11.4.1.2	Not Applicable	Sensory evaluations are not conducted in this facility.
Section Summary: Employees were observed to be in compliance with the company's hygiene policy. The process areas were well maintained. Doors were observed to be closed when not moving materials. False fingernails and fingernail polish were not observed. Waste was collected in trash cans and emptied as needed. Staff taste product only in the QA office. Product sensory evaluations were not conducted in this facility.			
9.4.2/11.4.1 Slaughtering and Butchering/Staff Engaged in Food Handling and Processing Operations	9.4.2.12/11.4.1.3	Compliant	
Section Summary: Hoses were observed on racks after use and not left on the floor.			
9.5.1/11.5.1 Water Supply	9.5.1.1/11.5.1.1	Compliant	
	9.5.1.2/11.5.1.2	Compliant	
Section Summary: Hot and cold potable water was available for processing and equipment cleaning. Water is sourced from three well inside the property. Well are registered through the Virginia Commonwealth Department of Health Division of Water Supply.			
9.5.2/11.5.1 Water Supply	9.5.2.1/11.5.1.3	Compliant	
	9.5.2.2/11.5.1.4	Not Applicable	Only tested potable water is used in the facility, including the ice processing.
	9.5.2.2/11.5.1.5	Not Applicable	Water is not stored on site.
Section Summary: The water lines are protected with back flow preventers, serviced once a year by an external plumber company. Last back flow preventer pressure test was conducted 3/14/2019. Only potable water is used in the facility.			
9.5.3/11.5.2 Water Treatment	9.5.3.1/11.5.2.1	Not Applicable	
	9.5.3.2/11.5.2.2	Not Applicable	
	9.5.3.3/11.5.2.3	Not Applicable	
	11.5.2.4	Not Applicable	
Section Summary: Water used for production use is not treated. The facility has a wastewater treatment facility which conducts testing of the water for quality and chlorine levels. Water test are documented on the Monthly Operating Report Chlorine Testing.			

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
9.5.3/11.5.3 Ice Supply	9.5.4.1/11.5.3.1	Compliant	
	9.5.4.2/11.5.3.2	Compliant	
Section Summary: Processing used ice is tested thought ice melted test is conducted on a monthly basis for Total Coliform and E. coli by an external certified laboratory. Records were reviewed for 4/8/19, 5/1/19 and 6/5/19. The ice machine was observed clean and in good condition.			
9.5.5/11.5.4 Monitoring Water Microbiology and Quality	9.5.5.1/11.5.4.1	Compliant	
	9.5.5.2/11.5.4.2	Compliant	
	9.5.5.3/11.5.4.3	Compliant	
Section Summary: Microbiology water testing, including ice is conducted from five locations by and external laboratory as validation once per month. Water microbiological test results were reviewed for 4/8/19, 5/1/19 and 6/5/19.. The facility tests four sites for Total Coliforms and E. coli.			
9.5.6/11.5.5 The Quality of Air and Other Gasses	9.5.6.1/11.5.5.1	Compliant	
	9.5.6.2/11.5.5.2	Compliant	
Section Summary: Compressed air is filtered and tested for purity on a quarterly basis for APC, yeast and mold. Test results were on file.			
9.6.1 Animal Transport	9.6.1.1	Compliant	
	9.6.1.2	Compliant	
Section Summary: Vehicles used for transport of animals for slaughters are designed specifically for this purpose and do not represent a risk for the animals. Transport vehicles inspections are conducted and documented in the Humane Handling Plant Audit Form. Audit forms were reviewed for 6/25-27/2019.			
9.6.2 Pens and Yards	9.6.2.1	Compliant	
Section Summary: Per the Animal Welfare guidelines, if animals are held for extended periods in pens and yards, per policy adequate supplies of water and fodder is provided. Water was constantly provided to all animals.			
9.6.3/11.6.1 Storage and Handling of Goods	9.6.3.1/11.6.1.1	Compliant	
	9.6.3.2/11.6.1.2	Compliant	
	9.6.3.3/11.6.1.3	Compliant	
	9.6.3.4/11.6.1.4	Compliant	
	9.6.3.5/11.6.1.5	Not Applicable	The facility does not use alternate or temporary storage areas.
	11.6.1.6	Not Applicable	The facility does not use alternate or temporary storage areas.
Section Summary: The facility utilizes the computerized program for warehouse inventory management. All shelf life information is entered into the system. Product rotation is based on FIFO following production code dates. Equipment storage areas allow access for cleaning and provide adequate protection of stored equipment. Temporary storage areas/facilities are not used by this plant.			
9.6.4/11.6.2 Cold Storage, Freezing and Chilling of Foods	9.6.4.1/11.6.2.1	Minor	Minor – Condensation was observed on a part of the ceiling above the Raw Finished Product Warehouse.
	9.6.4.2/11.6.2.2	Compliant	
	9.6.4.3/11.6.2.3	Compliant	
	9.6.4.4/11.6.2.4	Compliant	
	9.6.4.5/11.6.2.5	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Minor – Condensation was observed on a part of the ceiling above the Raw Finished Product Warehouse. Coolers, processing, non-processing and shipping areas temperature monitoring is continuously monitored 24/7 by a computer based system and verified manually with daily checks conducted by the refrigeration team and by the QA staff during pre-operations inspections. Cooler units were observed in good conditions and clean. Cleaning activities for all rooms are managed by the Master Sanitation Schedule. Daily temperature verification checks were reviewed for 6/1-26/2019. Monitoring records reviewed included Chilling Room Monitoring Forms, HACCP related temperature monitoring, Cooler/Refrigerated storing Areas Pre-operational Inspections, Production Rooms Temperature Forms. All coolers discharge from defrost and condensate lines are controlled and discharged to the drainage system.			
9.6.5/11.6.3 Storage of Equipment and Containers	9.6.5.1/11.6.3.1	Compliant	
Section Summary: Rooms used for the storage of product ingredients, packaging, and other dry goods are located away from wet areas and build with metal racks to store dry ingredients and packaging materials.			
9.6.5/11.6.4 Storage of Equipment and Containers	9.6.5.2/11.6.3.2	Compliant	
Section Summary: Packaging and ingredients storage racks were made from metal, clean and in good conditions. Storage areas were organized and do not represent a pest issue risk.			
9.6.5/11.6.5 Storage of Equipment and Containers	9.6.5.3/11.6.3.3	Compliant	
Section Summary: Vehicles used in food contact, handling or processing zones or in cold storage rooms were observed in good conditions and did not represent a risk to products. All equipment is electric.			
9.6.6/11.6.4 Storage of Hazardous Chemicals and Toxic Substances	9.6.6.1/11.6.4.1	Compliant	
	9.6.6.2/11.6.4.2	Compliant	
	9.6.6.3/11.6.4.3	Compliant	
	9.6.6.4/11.6.4.4	Not Applicable	Pesticides, rodenticides, fumigants and insecticides are not stored in the facility.
	9.6.6.5/11.6.4.5	Compliant	
Section Summary: Hazardous chemicals were appropriately stored in a well ventilated, secure location and separated from food processing outside the facility away from food handling, food storage and packaging storage areas. Pesticides, rodenticides, fumigants and insecticides are not stored in the facility.			
9.6.7/11.6.5 Loading, Transport, and Unloading Practices	9.6.7.1/11.6.5.1	Compliant	
Section Summary: The practices and methods applied during loading, transport and unloading of food is documented, implemented for live stock and packaging material. Unloading of live stock was observed to be according to company and animal welfare standards. Loading of finished product was conducted in a matter to prevent contamination or damage to the product in monitored pre-refrigerated trucks.			
9.6.8/11.6.6 Loading	9.6.8.1/11.6.6.1	Compliant	
	9.6.8.2/11.6.6.2	Compliant	
	9.6.8.3/11.6.6.3	Compliant	
Section Summary: Shipping transport vehicles were being checked for general condition, cleanliness, pest issues and temperature monitoring (pre-cooling). Loads (finished product) was inspected for general conditions/appearance and temperature at < 40F. Truck inspections are recorded in the Trailer Inspection Form. Truck shipping records includes; trailer conditions, and temperature, product temperature (< 40F), product conditions, product label information, product code, product lot, seal number and responsible employee. Shipping records were reviewed for 6/25-27/19.			
9.6.9/11.6.7 Transport	9.6.9.1/11.6.7.1	Compliant	
	9.6.9.2/11.6.7.2	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: Temperatures of refrigerated trucks and product are taken and recorded before loading the trucks. Truck temperatures are recorded in the Truck Inspection/Shipping Loads Log/. Refrigeration trucks available during the audit were observed to be functioning properly and clean. Shipping records were reviewed for 6/25-27/19.			
9.6.10/11.6.8 Unloading	9.6.10.1/11.6.8.1	Compliant	
	9.6.10.2/11.6.8.2	Compliant	
Section Summary: Unloading guidelines for packaging and dry ingredients receiving are outlined in the Receiving Process. The facility receives live stock as raw material. Live animal receiving procedures are documented in the Animal Welfare Procedures. Live animal receiving records were (Human Handling Plant Audit Form) reviewed for 6/25-27/19.			
9.7.1/11.7.1 Process Flow	9.7.1.1/11.7.1.1	Compliant	
Section Summary: Process flow for the product process and employee traffic is designed to prevent cross contamination. Kill, evisceration and debone areas are physically segregated in separated rooms, including sanitary facilities, locker rooms and break rooms.			
9.7.2/11.7.2 Receipt of Raw and Packaging Materials and Ingredients	9.7.2.1/11.7.2.1	Compliant	
Section Summary: Dry ingredients are not received at the facility. Packaging materials are received and stored separately from any raw materials. No unprocessed chilled raw materials are received.			
11.7.3 Thawing of Food	11.7.3.1	Not Applicable	
	11.7.3.2	Not Applicable	
	11.7.3.3	Not Applicable	
	11.7.3.4	Not Applicable	
Section Summary: The facility does not thaw product.			
9.7.3/11.7.4 High Risk Areas/High Risk Processes	9.7.3.1/11.7.4.1	Compliant	
	9.7.3.2/11.7.4.2	Compliant	
	9.7.3.3/11.7.4.3	Compliant	
	9.7.3.4/11.7.4.4	Compliant	
	9.7.3.5/11.7.4.5	Compliant	
Section Summary: Processing of high risk product is conducted in a manner to prevent contamination. RTE areas of the facility are separated from raw areas of the facility to prevent the chance of cross contamination. The RTE employees are required to wear different frocks with disposable protective equipment in high risk processing room. The RTE area has a separate area to allow employees to put on proper garments before entering the RTE area. The design of the process does allow for proper transfer of product from the raw area of the facility to the RTE and proper procedures are followed to prevent the chance of cross-contamination.			
9.7.4/11.7.5 Control of Foreign Matter Contamination	9.7.4.1/11.7.5.1	Compliant	
	9.7.4.2/11.7.5.2	Compliant	
	9.7.4.3/11.7.5.3	Compliant	
	9.7.4.4/11.7.5.4	Compliant	
	9.7.4.5/11.7.5.5	Compliant	
	9.7.4.6/11.7.5.6	Compliant	
	9.7.4.7/11.7.5.7	Compliant	
	9.7.4.8/11.7.5.8	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
	9.7.4.9/11.7.5.9	Compliant	
Section Summary: The facility has implemented a documented foreign material contamination control program (Control of Foreign Material Control – 3/18/2019). The procedure covers; metal control procedure, metal detector verification practices, metal detector rejected product corrective actions, isolation practices for suspected or known contamination, foreign material finding and minimum corrective actions guidelines, salvage of contaminated product guidelines, non-metal contamination practices and glass/brittle plastic contamination. The program includes the responsibility for management, Food Safety and QA regarding foreign material contamination for metal, non-metal contamination, plastic palest checks, preventive maintenance, lubricant control, pre-operational inspections, wood control, temporary repairs guidelines, metal detection equipment maintenance and verification for belt inspections, injector, grinder and glass/brittle plastic control. Processing equipment is maintained through a preventive maintenance program. The facility conducts on a monthly basis a glass/brittle plastic inspection. A glass and brittle plastic inventory log was on file. The facility conducted a quarterly glass and brittle plastic audit using the Glass and brittle Plastic Register – 2019. An audit was conducted 3/7-14/2019.		
9.7.5/11.7.6 Detection of Foreign Objects	9.7.5.1/11.7.6.1	Compliant	
	9.7.5.2/11.7.6.2	Compliant	
	9.7.5.3/11.7.6.3	Compliant	
Section Summary: A metal detector procedure is in place that includes service frequency (annual calibration), daily verification frequency, testing limits, monitoring responsibilities and corrective actions. Metal detectors are located at all packaging lines, equipped with alarms and automatic stops and/or product rejection mechanism. Metal detectors are verified using control limits for all products using ferrous, non-ferrous, and stainless steel based on product size, process and customer requirements. Metal detector daily monitoring records were reviewed for 6/17-21/2019.			
9.7.6/11.7.7 Managing Foreign Matter Contamination Incidents	9.7.6.1/11.7.7.1	Compliant	
	9.7.6.2/11.7.7.2	Compliant	
Section Summary: Policies and procedures are in place stating the requirement of the isolated, inspected or disposed of the product in case of foreign material contamination under the Glass and Brittle Plastic Policy, Metal Detector Verification Procedure and in Foreign Material Control Plan.			
9.8.1/11.8.1 Location	9.8.1.1/11.8.1.1	Not Applicable	
	9.8.1.2/11.8.1.2	Not Applicable	
	9.8.1.3/11.8.1.3	Not Applicable	
Section Summary: The facility does not have a on-site laboratory.			
9.9.1/11.9.1 Dry and Liquid Waste Disposal	9.9.1.1	Compliant	
	9.9.1.2/11.9.1.1	Compliant	
	9.9.1.3/11.9.1.2	Compliant	
	9.9.1.4/11.9.1.3	Compliant	
	11.9.1.4	Compliant	
	11.9.1.5	Compliant	
	11.9.1.6	Compliant	
	11.9.1.7	Compliant	
	9.9.1.5/11.9.1.8	Compliant	
	9.9.1.6/11.9.1.9	Compliant	

SECTION	ELEMENT	PRIMARY RESPONSE	EVIDENCE
Section Summary: The responsibility and methods used to collect and handle dry and wet waste is responsibility of operations and verified by QA. This process is outlined in the Waste Disposal Program. Waste management practices are a part of the daily hygiene operations and inspections and of the monthly internal GMP audits program. Waste was appropriate controlled and contained in the internal and external areas.			
9.10.1/11.10.1 Grounds and Roadways	9.10.1.1/11.10.1.1	Minor	Minor – Garbage and debris were observed outside the of the high voltage area.
	9.10.1.2/11.10.1.2	Compliant	
	9.10.1.3/11.10.1.3	Compliant	
	11.10.1.4	Compliant	
	9.10.1.4/11.10.1.5	Compliant	
	9.10.1.5/11.10.1.6	Compliant	
Section Summary: Minor – Garbage and debris were observed outside the of the high voltage area. With the exception note under question 9.10.1.1/11.10.1.1, Facility external areas including, paths, roadways and loading and unloading areas were well maintained clean and did not represent food safety or product quality risk.			