



# Certificate Of Registration

## Sunnyland Mills

4469 E. Annadale Ave.  
Fresno, California 93725-2221  
United States

is registered as meeting the requirements of the

**SQF Food Safety Code for  
Food Manufacturing**

**Edition 9.0**

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### Certification Details

Date of Decision: September 4, 2025  
Date of Audit: July 24, 2025  
Certificate Number: 7991

Date of Expiry: November 4, 2026  
Date of Next Recertification Audit: August 21, 2026  
Certification Type: Unannounced

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### Registration Schedule :

#### Scope of Registration (Food Sector Categories and Products)

**FSC(s) :** 22. Processing of Cereal Grains  
**Products :** Whole wheat, pearled wheat, bulgur wheat, and bulgur pilaf mix



# SQF Food Safety Audit Edition 9

Sunnyland Mills - 7991

## Summary

**Audit Decision**

Certified

**Certificate Number**

7991

**Audit Rating**

Excellent

**Decision Date**

September 4, 2025

**Audit Type**

Unannounced

**Recertification Date**

August 21, 2026

**On-Site Audit Dates**

July 23, 2025 - July 24, 2025

**Expiration Date**

November 4, 2026

**ICT Dates**

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**Issue Date**

September 5, 2025

## Facility and Scope

**Sunnyland Mills - 7991**

4469 E. Annadale  
Fresno, CA 93725 United States

**Products**

wheat  
Whole wheat, pearled wheat, bulgur wheat, and  
bulgur pilaf mix

**Food Sector Categories**

22. Processing of Cereal Grains

**Scope of Certification**

Processing and manufacturing of whole wheat,  
pearled wheat, bulgur wheat, and bulgur pilaf mix

## Certification Body and Audit Team

**SCS Global Services**

2000 Powell St  
Suite 600  
Emeryville, CA 94608 United States

**CB#:** 42248

**Accreditation Body:** ANAB

**Accreditation Number:** 821

**Lead Auditor:** Amir Shafae (C-371398)

**Technical Reviewer:** Monica Alvarado (C-367035)

**Hours Spent on Site:** 16

**Hours of ICT Activities:**

**Hours Spent Writing Report:** 8

## Section Responses

### Audit Statement - Audit

**SQF Practitioner Name** - Name the designated SQF Practitioner

**Response:** Saso Danilovski

**SQF Practitioner Email** - Email of the designated SQF Practitioner

**Response:** saso@sunnylandmills.com

**Opening Meeting** - People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)

**Response:** Saso Danilovski: QC Manager/SQFP, Amir Shafae: SQF Auditor

**Facility Description** - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

**Response:** Sunnyland Mills is situated in the commercial area of Fresno, CA. The entire facility covers approximately 16,000 sqft, with about 50% of the area dedicated to processing. The company is operated by about 14 Employees, working 5 days per week from 6 am – 5:30 pm Mon-Fri. The operation, established in approximately 1935, moved in this location in 1990 when the building was first build. The facility has implemented three food safety/HACCP plans for its processes and products. It manufactures/distributes the following products: Bulgur Wheat, Pearled and Whole Wheat. The facility does not have any cooler or freezer. However, the facility has US Cold Storage as backup in case they would need backup storage capacity. The audit was conducted without exclusions, and representative manufacturing activities were observed during the audit.

**Closing Meeting** - People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

**Response:** Saso Danilovski: QC Manager, Steven Orlando: President, Amir Shafae: SQF Auditor

**Auditor Recommendation** - Auditor Recommendation

**Response:** Issue certificate once deficiencies are rectified in allotted time.

### 2.1.1 - Management Responsibility (Mandatory)

**2.1.1.1** - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel

**Response:** Compliant

**2.1.1.2** - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are

informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**2.1.1.5** - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### **Summary -**

**Response:** Senior management has prepared and implemented Management Responsibility titled 2.1.1 Management Responsibility, version 4, dated 7/18/2025. This statement outlines the commitment of all management to: \* Supply safe food \* Establish and support a food safety culture within the site \* Continuously improve the site's food safety management system \* Adhere to customer and regulatory requirements to ensure the supply of safe food The policy statement, signed by the president on 7/18/2025, is prominently displayed breakroom and effectively communicated to all site personnel in the language(s) understood by everyone. Commitment to Food Safety Culture: Senior management will lead and support a

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food safety culture within the site that ensures: \* Establishment, documentation, and communication of food safety objectives and performance measures to all relevant staff \* Adequate resources are available to meet food safety objectives \* Adoption and maintenance of food safety practices and all applicable requirements of the SQF System \* Employees are informed and held accountable for their food safety and regulatory responsibilities \* Employees are positively encouraged and required to notify management about actual or potential food safety issues \* Employees are empowered to act to resolve food safety issues within their scope of work

**Reporting Structure and Responsibilities:** The reporting structure, dated 7/15/2025, names and describes personnel with specific responsibilities for tasks within the food safety management system and identifies backups for key personnel. Job descriptions for key positions (Office Manager/Backup SQFP, COO/CEO/President, QC Manager) have been documented. Management ensures that departments and operations are appropriately staffed and organizationally aligned to meet food safety goals.

**Designation of SQF Practitioners:** Senior management has designated a primary and substitute SQF practitioner for each site. These practitioners are responsible for overseeing the development, implementation, review, and maintenance of the SQF System, taking appropriate actions to ensure the integrity of the SQF System, and communicating essential information to relevant personnel. The primary SQF Practitioner, QC Manager, is a full-time employee of the facility and has completed a HACCP food safety training course, as shown by a certificate from SCS Global/International HACCP Alliance dated 7/23/2020, as well as certifications in PCQI dated 3/16/2016, SQF dated 5/28/2021, and Internal Audit dated 2/14/2014. The substitute SQF Practitioner, Office Manager, is also a full-time employee of the facility and holds similar qualifications, with certificates from SCS Global/International HACCP Alliance dated 7/10/2022 and SQF dated 3/17/2022.

**Continuous Improvement and Integrity:** The SQF Practitioner manages the development, implementation, and maintenance of the SQF System. Senior site management has processes in place to demonstrate continuous improvement and to ensure the integrity of the food safety systems during organizational or personnel changes.

**Blackout Dates:** The blackout dates are as follows: Holidays and Weekends.

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## 2.1.2 - Management Review (Mandatory)

**2.1.2.1** - The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained.

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** The site's Food Safety Team conducts an annual review of the entire SQF System, with the most recent review documented and completed on 6/20/2025. This review encompasses updates to the food safety management system documentation (including policies, procedures, specifications, and food safety plans); assessments of food safety culture performance; evaluation of food safety objectives and performance; corrective and preventive actions and trends related to internal audits, external audits, customer complaints,

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verification and validation activities; hazard and risk management systems; and follow-up actions from the previous management review. The SQF Practitioner has been providing senior site management with monthly updates during the Management Meetings on any matters affecting the site's SQF System. Reviews of the monthly meetings held on 6/26/2025, 5/28/2025, and 4/29/2025 indicate that they were adequate.

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### 2.1.3 - Complaint Management (Mandatory)

**2.1.3.1** - The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The facility has developed and implemented a comprehensive complaint management policy titled 2.1.3 Complaint Management, version 4, dated 6/27/2025. This policy documents the methods and responsibilities for handling, investigating, and resolving complaints related to food safety, including those from commercial customers, consumers, and regulatory authorities. It encompasses products manufactured, handled on-site, or co-manufactured. **\*\*Investigation and Resolution Process\*\*** The investigation of complaints is overseen by QC Manager, who ensures that: - Complaints are thoroughly investigated by personnel knowledgeable about the incidents. - The root cause of adverse trends in customer complaint data is established through analysis. - Corrective and preventative actions are implemented based on the severity of the incident and findings from the root cause analysis, as outlined in SQF Code 2.5.3. Records of complaints, their investigations, and resolutions are meticulously maintained to ensure accountability and continuous improvement. Recent records reviewed for Wrong product shipped in March 2025 confirm that investigations and corrective actions were effectively conducted. Year to date, there has been only one complaint. **\*\*Data Analysis and Trend Monitoring\*\*** Adverse trends in customer complaint data, spanning the period Jan 2024 - Jun 2025, have been reviewed through trending graphs. This analysis aids in identifying potential issues and reinforcing the facility's commitment to preventive measures.

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### 2.2.1 - Food Safety Management (Mandatory)

**2.2.1.1** - The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls

that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

**Response:** Compliant

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**2.2.1.2** - Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

**Response:** Compliant

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#### Summary -

**Response:** The facility has established a comprehensive Food Safety Management System, documented under 2.2.1 Food Safety and Quality Management, version 4, dated 7/18/2025, to ensure compliance with the SQF Food Safety Code: Food Manufacturing. This system outlines the organization's food safety policies, procedures, and methods, which are maintained in both electronic and hard copy formats for accessibility to relevant staff. **\*\*Key Components of the Food Safety Management System\*\*** The documentation includes: 1. A summary of the organization's food safety policies and methods for meeting SQF standards. 2. The food safety policy statement and organizational chart, accurately reflecting the scope and relevant products. 3. Processes and products covered within the scope of certification. 4. Applicable food safety regulations for the manufacturing site and countries of sale (if known). 5. Specifications for raw materials, ingredients, packaging, and finished products. 6. Food safety procedures, prerequisite programs (PRPs), and food safety plans. 7. Process controls impacting product safety. 8. Additional documentation essential for the development, implementation, maintenance, and control of the SQF System. **\*\*Change Management and Validation\*\*** The system also incorporates procedures for verifying and justifying modifications to food safety plans, PRPs, GMPs, regulatory requirements, and product specifications. All changes to these elements are reviewed, validated, or justified prior to implementation, with reasons for the changes documented. **\*\*Ongoing Review and Communication\*\*** Food safety plans, GMPs, and other relevant aspects of the SQF System are reviewed, updated, and effectively communicated whenever changes occur that could impact the facility's ability to deliver safe food. This integrated framework ensures a robust and adaptable Food Safety Management System, aligning with organizational and regulatory expectations. Let me know if there's anything more you'd like to refine!

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### 2.2.2 Document Control (Mandatory)

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

**Response:** Compliant

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#### Summary -

**Response:** Document Control - 2.2.2 / 2.2.3 Document Control and Records, version 4, dated 7/1/2025 - outlines how each department's specific programs and policies are to be found, checked, and maintained. Documents are stored digitally or in a designated filing cabinet and controlled by the SQF practitioner. All employees have authorized access (Read Only) with some member having the right to generate and revise documents. An electronic document register is found Company uses an electronic storage and document

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sharing program for accessibility.

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### 2.2.3 - Records (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Records Control Procedure, 2.2.2 / 2.2.3 Document Control and Records, version 4, dated 7/1/2025, outlines a Records Retention Schedule detailing the records will be kept for a minimum of 2 years and min 5 years for Organic products. The records are updated and kept by SQFP. Records are readily accessible, retrievable, securely stored electronically and as hard copies. Records were seen to be signed and dated by those completing the work. The records are verified by Supervisors or QA Team within seven days or less. Reviewed following records: Metal Detector Portable conveyor system checks 5/1/2025 - 5/30/2025, 6/2/2025 - 6/27/2025; Metal Detector Gravity System Checks 5/1/2025 - 5/30/2025, 6/2/2025 - 6/27/2025; Daily Product HACCP Check Sheet (magnet and screen and sifters) 5/1/2025 - 6/27/2025; Daily Processing HACCP Check Sheet 5/2/2025 - 6/27/2025; Receiving / Cleaning HACCP Check Sheet (magnet) 5/1/2025 - 6/27/2025.

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### 2.3.1 - Specification, Formulation, and Realization

**2.3.1.1** - The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

**Response:** Compliant

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**2.3.1.2** - New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

**Response:** Compliant

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**2.3.1.3** - A food safety plan shall be validated and verified by the site food safety team 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.

**Response:** Compliant

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**2.3.1.4** - Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

**Response:** Compliant

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**2.3.1.5** - The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

**Response:** Compliant

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**2.3.1.6** - Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** The Plan, 2.3.1 Product Formulation and Realization, version 7, dated 6/23/2025, includes include a list of all products in the scope of the certification, a complete product description, intended product use (including vulnerable populations) and flow diagrams for each process including all input and output steps in the process. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. N/A: Product Development is not conducted at this site.

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### 2.3.2 - Specifications (Raw Material, Packaging, Finished Product, and Services)

**2.3.2.1** - The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

**Response:** Compliant

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**2.3.2.2** - Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

**Response:** Compliant

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**2.3.2.3** - All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

**Response:** Compliant

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**2.3.2.4** - Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

**Response:** Compliant

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**2.3.2.5** - Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

**Response:** Compliant

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**2.3.2.6** - Verification of packaging shall include a certification of 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, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

**Response:** Compliant

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**2.3.2.7** - Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

**Response:** Compliant

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

**Response:** Compliant

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**2.3.2.9** - Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.

**Response:** Compliant

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**2.3.2.10** - Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

**Response:** Compliant

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#### **Summary -**

**Response:** A policy defining the methods and responsibilities for developing, managing, and approving raw material, finished product, and packaging specifications has been documented and implemented in 2.3.2 Raw and Packaging Materials, version 5, dated 1/2/2025. Specifications for raw materials, packaging, ingredients, additives, chemicals and processing aids have been documented. Specifications, 3rd party audit, and LOG/LOC for Fully Cleaned Wheat (Adams Grain, Co) dated 8/12/2024, Raw Wheat dated 6/25/2025, and Primary Packaging were reviewed and found to be current. Raw materials must have COA at the point of receiving. Approved suppliers must notify the site of changes in product composition that could have an impact of product formulations. This is documented in the Approved Supplier Program. Product labels are approved by QC Manager, who is qualified to ensure they are accurate and meet regulatory requirements. Descriptions of services provided by all contract service providers having an impact on food safety are documented. A list of current contract service providers is kept Food Safety Binder and found to include providers of services including Mayo trucking, Mission Linen, SCS Gobal, US Cold Storage, and Metal Detection Services. Finished product specifications are current, documented, and approved by the site and its customers. Specifications include chemical limits, physical limits, composition, labeling and packaging requirements. Finished product specifications for Traditional 100% Whole Grain Bulgur Wheat dated 1/2/2025, Dark Brown 100% Whole Grain Bulgur Wheat dated 1/2/2025, and 100% Certified Organic Kamut Khorasan 100% whole grain bulgur dated 1/2/2025, were reviewed during the audit and had the required information. Specifications for raw materials, packaging materials, chemicals, processing aids, contract services, and finished products are reviewed on an annual basis with that last documented review taking place on 1/2/2025.

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### 2.3.3 - Contract Manufacturers

**2.3.3.1** - The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.

**Response:** N/A

**Evidence:** • N/A: The site does not use contract manufacturers.

**2.3.3.2** - The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

**Response:** N/A

**Evidence:** • N/A: The site does not use contract manufacturers.

**2.3.3.3** - Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.

**Response:** Compliant

**2.3.3.4** - Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

**Response:** N/A

**Evidence:** • N/A: The site does not use contract manufacturers.

#### Summary -

**Response:** Facility has a third-party warehouse, US Cold Storage, as their backup in case they run out of space. The facility has done a documented risk assessment on 4/10/2025. Facility has also, reviews food safety documents of the 3rd part storage in case their services needed. N/A: The site does not use contract manufacturers. (Sections 2.3.3.1 – 2.3.3.2, 2.3.3.4).

### 2.3.4 - Approved Supplier Program (Mandatory)

**2.3.4.1** - The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

**Response:** Compliant

**2.3.4.2** - The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the

approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

**Response:** Compliant

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**2.3.4.3** - Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

**Response:** Compliant

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**2.3.4.4** - The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

**Response:** Compliant

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**2.3.4.5** - Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

**Response:** Compliant

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**2.3.4.6** - Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

**Response:** Compliant

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#### **Summary -**

**Response:** The site has a written supplier approval policy, 2.3.4 Approved Supplier Program, version 6, dated 6/23/2025, which has been implemented and covers the procedures for selecting, evaluating, approving, and checking suppliers of raw materials, ingredients, and packaging materials. Approved supplier registers include supplier contact details which include emergency/backup suppliers. Approved supplier risk-based performance and status is reviewed on Jan 2025. The policy includes a review of the specifications of products, the supplier's food safety controls, procedures for granting and checking approved suppliers, the level of risk of products to the site and details of requirements for Certificate of Conformance, Certificates of Analysis and testing. A register dated Jan 2025 is supported of all current approved suppliers, which was reviewed during the audit and found to be acceptable. Raw materials: Fully Cleaned Wheat (Adams Grain, Co) dated 8/12/2024, Raw Wheat dated 6/25/2025 were verified to have come from suppliers on the Approved Supplier List and documented reviewed to confirm risk level and monitoring details. The procedures for emergency use of non-approved suppliers have been documented. Supplier audits are based on risk; audits were on file for approved suppliers of ingredients/components.

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

**2.4.1.1** - The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

**Response:** Compliant

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**2.4.1.2** - The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

**Response:** Compliant

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**2.4.1.3** - SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to [foodsafetycrisis@sqfi.com](mailto:foodsafetycrisis@sqfi.com).

**Response:** Compliant

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#### Summary -

**Response:** The site has ensured that products delivered to its customers follow regulatory requirements in the country of use per 2.4.1 Food Safety System, version 6, dated 7/14/2025. Regulatory compliance for this operation includes FDA FSMA (food safety requirements, allergen content, etc.). The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of web sites: FDA, USDA, etc. Facility follows Recall Procedure. SQFI and CB are listed in External communication list, and notification within 24 hours. Reg.# XXXXXX5374 expire 12/31/2026, and reviewed Business license: State of California Department of Public Health, Registration # 16662 (organic) expire 2/22/2026.

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### 2.4.2 - Good Production Practices (Mandatory)

**2.4.2.1** - The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

**Response:** Compliant

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**2.4.2.2** - The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

**Response:** Compliant

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#### Summary -

**Response:** The property, buildings and equipment are found, constructed and designed to ensure food is manufactured in a safe, hygienic environment. The site has written and implemented those Good Manufacturing Practices applicable to the scope of this certification. These food safety pre-requisite programs are found in food safety binder.

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### 2.4.3 - Food Safety Plan (Mandatory)

**2.4.3.1** - A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

**Response:** Compliant

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**2.4.3.2** - The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the

relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

**Response:** Compliant

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

**Response:** Compliant

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**2.4.3.4** - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

**Response:** Compliant

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**2.4.3.5** - The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

**Response:** Compliant

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**2.4.3.6** - The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

**Response:** Compliant

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**2.4.3.7** - The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

**Response:** Compliant

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**2.4.3.8** - The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

**Response:** Compliant

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**2.4.3.9** - The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

**Response:** Compliant

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**2.4.3.10** - Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

**Response:** Compliant

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**2.4.3.11** - For each identified CCP, the food safety team shall identify and document the limits that separate safe

from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

**Response:** Compliant

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**2.4.3.12** - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

**Response:** Compliant

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**2.4.3.13** - The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

**Response:** Compliant

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**2.4.3.14** - The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

**Response:** Compliant

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**2.4.3.15** - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

**Response:** Compliant

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**2.4.3.16** - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

**Response:** Compliant

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**2.4.3.17** - Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

**Response:** Compliant

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#### **Summary -**

**Response:** The three Food Safety Plans have been developed, implemented, and kept by the site based on 12-steps identified in the Codex Alimentarius Commission HACCP guideline and per FSMA requirements, the facility has converted HACCP to include the Preventive Controls. The plans are maintained by the company's server. A multi-disciplinary Food Safety Team has been named and trained, with documentation found in HACCP Programs. The teams are representing different department such as President, Production Supervisor, Quality Control Manager, 1st shift Processor, 2nd Shift Processor, Utility Manager, and Office Manager. The Plan includes a list of all products in the scope of the certification, a complete product description, intended product use (including vulnerable populations) and flow diagrams for each process including all input and output steps in the process. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. HACCP 1: Bulgur Wheat

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Products (Conventional and Organic): Critical Control Points have been identified as CCP1: Metal Detector (Conveyor system) (2.0mm Fe, 2.2mm NFe, 2.5mm SS) twice a day at start and mid-shift, CCP2: Metal Detector (in-line) (1.5mm Fe, 1.5mm NFe, 2.0mm SS) twice a day at start and mid-shift), CP: CP 1: Magnets, CP 2: Screen Preventive Controls have been identified as PC: Allergen: label review at receiving and beginning of each run and at receiving, PC: Sanitation Control, PC: Supply Chain. HACCP 2: Pearled and Whole Wheat Product: Critical Control Points have been identified as CCP1: Metal Detector (Conveyor system) (2.0mm Fe, 2.2mm NFe, 2.5mm SS) twice a day at start and mid-shift, CCP2: Metal Detector (in-line) (1.5mm Fe, 1.5mm NFe, 2.0mm SS) twice a day at start and mid-shift), CP: Magnets, CP: Screen. Preventive Controls have been identified as PC: Allergen: label review at receiving and beginning of each run, PC: Sanitation Control, PC: Supply Chain. HACCP 3: Orlando Cracked Wheat Pilaf Mix: Critical Control Points have been identified as CCP1: Metal Detector (Conveyor system) (2.0mm Fe, 2.2mm NFe, 2.5mm SS) twice a day at start and mid-shift), CP: Magnets, CP: Screen. Preventive Controls have been identified as PC: Allergen: label review at receiving and beginning of each run, PC: Sanitation Control, PC: Supply Chain. Reviewed documents for 5/1/2025 - 5/30/2025, 6/2/2025 - 6/27/2025. These are checked and verified in the Food Safety plans. Any deviations found in monitoring of established control limits are documented and investigated, with proper disposal of involved products. The plans are verified as part of the SQF System and reviewed annually or when changes occur, by the food safety team with the last review date on 7/14/2025.

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#### 2.4.4 - Product Sampling, Inspection, and Analysis

**2.4.4.1** - The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

**Response:** Compliant

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**2.4.4.2** - Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

**Response:** Compliant

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**2.4.4.3** - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.

**Response:** N/A

**Evidence:** • N/A: The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety.

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**2.4.4.4** - Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.

**Response:** N/A

**Evidence:** • N/A: The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety.

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**2.4.4.5** - Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelf-life of the product.

**Response:** Compliant

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**2.4.4.6** - Records of all inspections and analyses shall be maintained.

**Response:** Compliant

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**Summary -**

**Response:** The site's procedures and criteria for sampling, inspecting and analyzing raw materials, work-in-progress and finished product have been documented and implemented in 2.4.4 Microbiological Control, version 12, dated 7/11/2025 and 2.4.4 Raw Material and Finished Product Testing, version 11, dated 7/11/2025. All analyses are conducted to nationally recognized standards or by an equivalent validated method. Facility places raw and finished product randomly on hold for microbiological testing about every 4 months or per customer requirement. N/A: The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety. (Sections 2.4.4.3 -2.4.4.4). Retention samples were seen to be kept for the shelf-life of the product and kept in warehouse. Product evaluation and testing records were reviewed for Bulgur Wheat - 5/16/2025 for Heavy metals, for pesticide, finished product (Bulgar Wheat): 5/19/2025, 1/21/2025, 11/22/2024 (wheat) - 3x per year - for aflatoxin and Deoxynivalenol and other general micro, and raw product: Hard White Wheat (HWW) 7/19/2024 for aflatoxin and Deoxynivalenol during the audit and found to be conducted per procedures. The facility uses the Safe Food Alliance, cert# 2754.02 expires 11/30/2026 for biological and chemical testing requirement.

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## 2.4.5 - Non-conforming Materials and Product

**2.4.5.1** - The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

**Response:** Compliant

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**2.4.5.2** - Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

**Response:** Compliant

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**Summary -**

**Response:** The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in 2.4.5 Non-Conforming Material and Product, version 4, dated 7/11/2025, which were found to be properly implemented in the facility. Methods to segregate, identify, manage and dispose of product include tagging and segregation, and were observed to minimize any inadvertent use. Nonconforming products or equipment is identified, segregated, or disposed of, with records maintained by QC Manager. This was seen during the audit by a review of the Hold and Release

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Log for items: 7/11/2025 for Org. Bulgur and 6/9/2025 for WW Berries for general hold (left overs) for rework. Year to date, there no hold for non-conforming products. Relevant staff is aware of the site's Hold policy, as shown by interviews with production associates.

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#### 2.4.6 - Product Rework

**2.4.6.1** - The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

**Response:** Compliant

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##### Summary -

**Response:** The site's policy for reworking (recycling or recouped) product has been documented, 2.4.6 Product Rework, version 7, dated 7/11/2025, and implemented. Reworked product is clearly found, traceable, inspected and analyzed before release. Rework operations were seen to be supervised by qualified personnel. Records are kept for all reworked products. These records, Rework Form, were reviewed during the audit for 7/11/2025 for Org. Bulgur and 6/9/2025 for WW Berries.

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#### 2.4.7 - Product Release (Mandatory)

**2.4.7.1** - The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained.

**Response:** Compliant

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**2.4.7.2** - Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

**Response:** Compliant

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**2.4.7.3** - In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

**Response:** Compliant

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##### Summary -

**Response:** All products are approved and released per 2.4.7 Product Release, version 4, dated 7/11/2025. These release procedures include ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety controls have been met. The procedure also includes a requirement to confirm product labels follow all regulatory requirements of the country of

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manufacture and countries of use. The facility uses a positive release method based on microbiological testing, once every four months or per customer requirement. In addition, products are released per Pre-Shipment release review requirement. This includes product evaluations, pre-op inspection, Preventive Controls, Reviewed Particle test chart, Production Quality Control, Cooking Quality Control, and Production Record, and Label Verification.

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#### 2.4.8 - Environmental Monitoring

**2.4.8.1** - A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

**Response:** Compliant

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**2.4.8.2** - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

**Response:** Compliant

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**2.4.8.3** - Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

**Response:** Compliant

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#### Summary -

**Response:** The site has implemented a risk-based environmental monitoring program, 2.4.8 Environmental Monitoring Program, version 3, dated 7/4/2025. This program is the responsibility of SQFP. The sampling and testing program includes Zone 1: 5 samples every other month for APC, Yeast, Mold, Zone 2: 5 samples on once every four month for EB and Listeria spp., Zone 3: 5 samples once every 4 month, Zone 4: 2 samples once per four month for Listeria spp. and Slamonella. Records reviewed from Feb 2025, Apr 2025 and Jun 2025. Reviewed the trends from Feb 2023 to Jun 2025. Facility takes corrective actions when unsatisfactory trends were found.

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

**2.5.1.1** - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** The methods, responsibilities and criteria for ensuring the effectiveness of all applicable elements of the SQF Program have been documented and implemented in 2.5.1 Validation, version 5, dated 5/8/2025. The entire SQF system is validated by section throughout the year by the SQF Practitioner. The frequency and methods used to validate and verify food safety fundamentals, critical limits, and other food safety controls

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identified in food safety plans are documented. Critical food safety limits are re-validated at least annually. Records of all verifications of effectiveness and validations are kept by the SQFP.

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### 2.5.2 - Verification Activities (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The methods, responsibilities and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and legality of certified products has been documented and implemented in 2.5.2.1 Verification Activities, version 4, dated 5/5/2025. The site has established a verification schedule, dated 5/5/2025, outlining the verification frequency and responsibilities for each verification activity. The schedule is found in 2.5.2.2 QC Verification Schedule, version 6 and maintained by the SQFP. Records of verification of monitoring activities including Production Daily QC Report and GMP daily inspection were reviewed.

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

**2.5.3.1** - The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, 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. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The site's Corrective and Preventative Action program is written in 2.5.3 Corrective and Preventive Action, version 5, dated 5/2/2025. It describes the methods and responsibilities for investigating, resolving and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Reviewed Corrective Action Report. Records of investigations and corrective actions were reviewed for Report# 1-25 for silo gate not properly closed, Report# 2-25 for scale issue, and 3/19/2025 for wrong shipment. These were found to have reviews, investigations, corrective and preventative actions and resolutions documented.

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

**2.5.4.1** - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

**2.5.4.4** - Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3. Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

**Response:** Compliant

#### Summary -

**Response:** The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per 2.5.4 Internal Audits and Inspection, version 4, dated 5/5/2025. The Internal Audit Program is maintained by QC Manager. All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventive actions by meeting and training. This was last completed on 7/1/2025 (facility) and 7/21/2025 (documentation). Personnel conducting audits have been trained and where practical, audit areas independent of their function. Internal auditor training records were reviewed for QC Manager/SQFP. Facility and equipment inspections are conducted daily to ensure Good Manufacturing Practices are followed. Records of internal audits were reviewed from 5/27/2025 to 7/14/2025. Objective evidence was observed to be included in records of internal audits.

#### 2.6.1 - Product Identification (Mandatory)

**2.6.1.1** - The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

**Response:** Compliant

**2.6.1.2** - Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** A policy defining how products are identified from receipt through production and shipping has been documented in 2.6.1 Product Identification, version 4, dated 6/4/2025. The site's identification system ensures all raw materials, ingredients, packaging materials, work-in-progress, process inputs and finished goods are clearly identified at all stages of their process. Items are marked at receipt by receivers. Product identification noted for example: examples: 1457SM = 145 (Julian production day) = May 25, 7 = 2017, SM= Sunnyland Mills and 1457SMO = 145 (Julian production day) = May 25, 7 = 2017, SM= Sunnyland Mills Organics reviewed and demonstrated the products were properly identified throughout the process. Product startup/changeover procedures, within this program, during packing ensure that the correct product goes into the correct package with the correct label.

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### 2.6.2 - Product Trace (Mandatory)

**2.6.2.1** - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** A policy defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back). This is written in 2.6.2 Product Trace, version 4, dated 6/4/2025. Any rework is identified to ensure traceability. The effectiveness of the trace system is conducted at least annually, as part of the product withdrawal and recall program. Records of the receipt, use and dispatch of finished product are kept. A mock trace was conducted during the audit, 7/8/2025 Production Day, finished product lot# 1895501, the raw material received in amount of 221260 lbs., there is about 1.5-2% shrinkage due to cooking, the cooked product is transferred to 6 different finished good silos before packing. During the packing about 8-10% loss expected, total packed was around 198632 lbs., this makes the recovery about 100% within 90 min time frame.

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### 2.6.3 - Product Withdrawal and Recall (Mandatory)

**2.6.3.1** - The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information; iii. Outline a communication plan to



inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

**Response:** Compliant

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**2.6.3.2** - The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The site has a Recall Plan defining the methods and responsibilities for withdrawing and recalling product if necessary documented in 2.6.3 Product Withdrawal and Recall, version 6, dated 6/4/2025. A recall team has been appointed and is led by CEO. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities, and other essential bodies. This includes SQFI and the Certification Body, who must be notified within 24 hours in writing of any food safety event requiring public notification. Investigation into the root cause of any product recall, mock recall or product withdrawal, with actions taken, was observed to be documented. Mock trace exercises are completed at least annually, one step forward and one step back, to verify the effectiveness of the system. Records were reviewed of the recall plan and summaries of the mock recall exercises performed for finished product lot#1895SM on 7/16/2025: Bulgur wheat received 221260 lbs. (4 lots), used in Fine Traditional Bulgur 2/2000 lbs and Extra Coarse Trad. Bulgur 5/2000, shipped the Extra Coarse Bulgur 5/2000 lbs. and Fine Traditional Bulgur 2/2000 in inventory, 100% recovery with about 2% loss, within 2 hours. The mock trace exercise records reviewed showed the Product Withdrawal and Recall procedures were evaluated back one step and forward one step with acceptable accountability.

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## 2.6.4 - Crisis Management Planning

**2.6.4.1** - A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do

not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The site's written Crisis Management Plan is found in 2.6.4 Crisis Management Planning, version 5, dated 6/4/2025. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. CEO has oversight of the Plan, and a Crisis Management team has been identified and trained as evidenced by SOP Training on 6/20/2025. The Plan includes responses to a business interruption, isolating and identifying affected product and a current crisis alert list. The Crisis Management Plan includes internal/external communications and sources of legal and expert advice. A test of the plan was conducted on 6/20/2025 involving a disaster scenario of Water Service Disruption, Flooding or Sewage back up that affected the food safety of the site's products. QC Manager has also outlined each person responsibility to ensure each team member know what to do in case this type of crisis happens. Records are kept in food safety binder, including follow-up corrective actions of this review and annual test of the Crisis Management Plan. The program also requires SQFI and CB notification in case of actual disaster.

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### 2.7.1 - Food Defense Plan (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** The site has conducted a food defense threat assessment, dated 5/21/2025, that identifies potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident. The site has a Food Defense Plan, 2.7.1 Sunny Mills Food Defense Policy, version 7, dated 5/21/2025, based on the threat assessment in which the methods, responsibilities, and criteria for preventing deliberate food adulteration have been documented and implemented. A food defense protocol includes the name of the senior manager responsible for food defense, CEO, methods to allow access to the site only for authorized personnel, designated access points, the secured storage of materials, and hazardous chemicals and the control of access to contractors and visitors. Instructions have been provided to all relevant staff by meeting and training. The threat assessment and prevention plan must be reviewed at least annually with the last review documented on 5/21/2025. The Food Defense Plan was last evaluated and challenged on 5/15/2025 with records reviewed for truck received without proper seals.

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## 2.7.2 - Food Fraud (Mandatory)

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

**Response:** Compliant

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**2.7.2.2** - A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

**Response:** Compliant

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**2.7.2.3** - Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** Food Fraud Vulnerability Assessment dated 3/3/2025, that identifies potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident. The site has a Food Fraud Plan, 2.7.2.2 Food Fraud Mitigation Plan, version 4, dated 4/26/2025, based on the Vulnerability Assessment in which the methods, responsibilities, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to substitution, finished product mislabeling, dilution, and counterfeiting. The site has developed a Food Fraud Mitigation Plan, dated 2/26/2025, to address the control of the identified food fraud

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vulnerabilities. Instructions have been provided to all relevant staff by meeting and training. The Vulnerability Assessment and Mitigation Plan were last reviewed on 4/26/2025 by SQFP.

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## 2.8.1 - Allergen Management (Mandatory)

**2.8.1.1** - The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan; and vi. Management plans for control of the identified allergens.

**Response:** Compliant

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**2.8.1.2** - Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.

**Response:** Compliant

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**2.8.1.3** - Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

**Response:** Compliant

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**2.8.1.4** - Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.

**Response:** Compliant

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**2.8.1.5** - Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.

**Response:** Compliant

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**2.8.1.6** - Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

**Response:** Compliant

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**2.8.1.7** - The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

**Response:** Compliant

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**2.8.1.8** - The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

**Response:** Compliant

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**2.8.1.9** - The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

**Response:** Compliant

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**2.8.1.10** - Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

**Response:** Compliant

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**2.8.1.11** - Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

**Response:** Compliant

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#### Summary -

**Response:** The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in 2.8.1 Allergen Management For Food Manufacturing, version 4, dated 6/27/2025 and is the responsibility of QC Manager. Allergens of concern in this operation were seen to be wheat. A risk analysis was observed to be in place, dated 6/27/2025, for allergens including raw materials, ingredients and processing aids such as food grade lubricants. Workplace allergens from locations such as lunchrooms, locker rooms and vending machines were found to be part of the allergen program. The operation was found to have a product identification system that includes clear identification and labeling of products to meet regulatory requirements when made on production lines used for allergenic products. Proper procedures for cleaning of food contact surfaces, including periodic validation of cleaning methods by protein-specific testing, were found to be in place. Product changeovers where allergen cross contamination could occur use scheduling to eliminate the risk of cross contact. Allergenic products in storage were observed during the audit to be properly labeled and stored separately to prevent cross-contamination. The product trace system ensures the complete trace of allergenic ingredients, including any rework, containing allergens. The site has procedures in place, found in 2.3.2.7 Finished product Labeling, version 4, dated 6/23/2025, to control the accuracy of finished product labels, including labels of allergenic products. Reviewed Label Verification Check Log (beginning and end of the day) May - July 2025 and Label Issuance (Reconciliation) Log (once per day - production day) May - July 2025.

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### 2.9.1 - Training Requirements

**2.9.1.1** - The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of QC Manager. The effectiveness of the facility's training program was evidenced by interviews with plant production associates

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## 2.9.2 - Training Program (Mandatory)

**2.9.2.1** - A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

**Response:** Compliant

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**2.9.2.2** - Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** The site has implemented a training program, entitled 2.9 Employee Training Material, version 8, dated 7/1/2025, which covers the necessary competencies for plant personnel. This program requires training to be conducted in implementing HACCP, CCP Monitoring, Personal Hygiene, GMPs, Sampling and Test Methods, Environmental Monitoring, Allergen Management, and other tasks identified as critical to meeting the effective implementation of the SQF code. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering HACCP, GMP, Allergen, etc. on 6/20/2025 and interviews with production associates, it was evident the proper refresher training has been conducted to ensure food safety and the SQF system are maintained. Specific refresher training topics are covered on an annual frequency. The training language and materials are in English, the language used in the operation and understood by all plant personnel. Training records reviewed included the participant's name, skills description, description of training, date of training, trainer, and training verification.

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## 11.1.1 - Premises Location and Approval

**11.1.1.1** - The site shall assess local activities and the site environment to identify any risks that may have an

adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

**Response:** Compliant

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#### Summary -

**Response:** An risk assessment, last reviewed on 3/27/2025, confirms that local activities and the site environment does not have an adverse impact on product safety. The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. The site maintains the required approvals by relevant authorities for their ongoing operations.

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### 11.1.2 - Building Materials

**11.1.2.1** - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

**Response:** Compliant

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**11.1.2.2** - Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

**Response:** Compliant

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**11.1.2.3** - Waste trap system shall be located away from any food handling areas or entrances to the premises.

**Response:** Compliant

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**11.1.2.4** - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

**Response:** Compliant

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**11.1.2.5** - Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

**Response:** Compliant

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**11.1.2.6** - Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

**Response:** N/A

**Evidence:** • N/A: The facility does not have overhead pipes carrying sanitary waste or wastewater.

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**11.1.2.7** - Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

**Response:** Compliant

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**11.1.2.8** - Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

**Response:** Compliant

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**11.1.2.9** - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

**Response:** Compliant

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#### Summary -

**Response:** Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage of overflow or wastewater. Drains were observed to be located and constructed for ease of cleaning and inspection. Wastewater during the audit was observed to be properly discharged. Waste trap systems are located at Waste Trap Location, which is away from food handling areas. Walls, ceilings, and doors are of durable construction with smooth and light-colored surfaces. These areas were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. N/A: The facility does not have overhead pipes carrying sanitary waste or wastewater. (Section 11.1.2.6). Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of easy cleanable Material and does cause product contamination. Drop ceilings were observed to allow for cleaning and inspection. Stairs, catwalks and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces.

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### 11.1.3 - Lightings and Light Fittings

**11.1.3.1** - Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

**Response:** Compliant

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**11.1.3.2** - Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

**Response:** Compliant

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**11.1.3.3** - Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

**Response:** Compliant

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#### Summary -

**Response:** Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lights

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are upgraded to LED and they are either covered or are shatter-proof.

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#### 11.1.4 - Inspection/ Quality Control Area

**11.1.4.1** - If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

**Response:** Compliant

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##### Summary -

**Response:** Suitable areas are provided for inspection and quality control activities, that are suitable for the examination and testing of the product. The area has easy access to hand washing; appropriate waste handling; and is kept clean.

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#### 11.1.5 - Dust, Insect, and Pest Proofing

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

**Response:** Compliant

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**11.1.5.2** - External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

**Response:** Compliant

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**11.1.5.3** - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

**Response:** Compliant

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##### Summary -

**Response:** All ventilation openings, doors, external windows, doors, and other openings were observed to be properly sealed to prevent any pest infestation or dust coming into the facility. External doors including personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. The dock doors and dock plates were properly sealed to prevent infestation. Electric insect devices, and interior and exterior rodent stations are located so the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

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#### 11.1.6 - Ventilation

**11.1.6.1** - Adequate ventilation shall be provided in enclosed processing and food handling areas. Where

appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

**Response:** Compliant

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**11.1.6.2** - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

**Response:** Compliant

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**11.1.6.3** - Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

**Response:** Compliant

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**11.1.6.4** - Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

**Response:** Compliant

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#### **Summary -**

**Response:** Adequate ventilation was available, where needed, in enclosed processing and food handling areas. Ventilation equipment was seen to be adequately cleaned, insect-proofed, and located to not pose a risk of contamination. There is no positive air pressure. Extractor fans, canopies, and heat extraction were observed to be adequate above cooking operations and other heat-generating operations so that no condensation was noted.

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### **11.1.7 - Equipment and Utensils**

**11.1.7.1** - Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

**Response:** Compliant

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

**Response:** Compliant

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**11.1.7.3** - Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

**Response:** Compliant

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**11.1.7.4** - Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

**Response:** Compliant

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**11.1.7.5** - Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

**Response:** Compliant

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**11.1.7.6** - Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

**Response:** Compliant

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**11.1.7.7** - All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

**Response:** Compliant

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**11.1.7.8** - Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

**Response:** Compliant

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**11.1.7.9** - Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

**Response:** Compliant

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#### **Summary -**

**Response:** Specifications for the Destoner and Grain Parboiling were reviewed and found to be complete. Purchasing procedures for equipment are documented in 11.1.7 Equipment, Utensils and Protecting Clothing, version 2, dated 4/16/2025 and were seen to be appropriately implemented. Equipment and utensils, (including tables, graders, packers, conveyors, tubs, bins and containers) are designed, constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. These items were found to be cleaned and stored properly after use to prevent cross contamination. Equipment storage rooms, in back of warehouse or trailers, were observed to be designed and constructed to allow for safe and hygienic storage. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. Vehicles used in food processing zones or cold storage rooms are maintained and operated so as not to present a food safety hazard. Forklifts and other vehicles in processing areas and storage areas were observed to not present a food hazard. Non-conforming equipment is identified, tagged, and/or segregated. Records of non-conforming equipment are maintained.

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### **11.1.8 - Grounds and Roadways**

**11.1.8.1** - A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

**Response:** Compliant

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**11.1.8.2** - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

**Response:** Compliant

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**11.1.8.3** - Paths from amenities leading to site entrances shall be effectively sealed.

**Response:** Compliant

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**Summary -**

**Response:** Exterior inspections are required to be completed on a monthly basis. Exterior inspection records were reviewed from 6/2/2025 and 7/1/2025. The grounds and surrounding areas were observed to minimize dust and be free of any waste so pests are not attracted. Paths, roadways and dock areas were seen to be adequately and properly drained and well maintained, so they do not present a hazard. No pooling water was observed during exterior inspections. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

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### 11.2.1 - Repairs and Maintenance

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

**Response:** Compliant

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**11.2.1.2** - Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

**Response:** Compliant

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**11.2.1.3** - Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

**Response:** Compliant

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**11.2.1.4** - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

**Response:** Compliant

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**11.2.1.5** - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

**Response:** Compliant

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**11.2.1.6** - Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

**Response:** Compliant

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**11.2.1.7** - Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

**Response:** Compliant

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**11.2.1.8** - Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

**Response:** Compliant

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**Summary -**

**Response:** The site has a preventive maintenance program, 11.2.1 Repairs and Maintenance, version 4, dated 4/23/2025, that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. There is a schedule of planned Preventive Maintenance, and tasks are documented in PM schedule spreadsheet. Failures of plant and equipment are documented in Preventive Maintenance Form and are reviewed by QC Manager. All Preventive Tasks are scheduled to be done outside of operation hours. Site supervisor is notified if there is a need for equipment repair during operation hours. Temporary repairs, if required, are appropriate, included in the cleaning program and have a plan for their removal. Machinery, conveyors and other equipment over or near food or food contact surfaces are lubricated with food grade materials. The food grade lubricants were noted to be properly labeled and stored separately in Food Grade Lube Storage. Paint is not used on food contact surfaces and any paint in processing areas was noted to be in good condition with no observed flaking.

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### 11.2.2 - Maintenance Staff and Contractors

**11.2.2.1** - Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

**Response:** Compliant

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**11.2.2.2** - All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

**Response:** Compliant

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**11.2.2.3** - Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

**Response:** Compliant

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**Summary -**

**Response:** Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures by means of on-site training and they are escorted at all times while on-site. When repairs and maintenance are complete, maintenance personnel remove all tools and debris and notify a supervisor. Appropriate cleaning and pre-operational inspections are carried out before resumption of operations, documented in Preventive Maintenance Form. Maintenance personnel are trained in good manufacturing practices and food safety. This was reviewed during the audit and found to be complete.

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### 11.2.3 - Calibration

**11.2.3.1** - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

**Response:** Compliant

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**11.2.3.2** - Equipment shall be calibrated against national or international reference standards and methods or to an

accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

**Response:** Compliant

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

**Response:** Compliant

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**11.2.3.4** - Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

**Response:** Compliant

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**11.2.3.5** - Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

**Response:** Compliant

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**11.2.3.6** - A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** The policy, 11.2.3 Calibration, version 14, dated 4/16/2024, defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented. Equipment is calibrated against national or international standards. A procedure to address the disposition of any affected product should inspection equipment be found to be out of calibration, written in 11.2.3 Calibration, version 14, dated 4/16/2024. Inspection and testing equipment are protected from damage or unauthorized use. The facility has developed a calibration schedule for all devices listed. This documentation is located in 11.2.3 Calibration dated 4/16/2024. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. A review of the calibration records for Metal Detector by BTE on 7/11/2025, Magnet pull test by Phenix Equipment on 7/2/2025, Scale by Best Weigh Scale Co, Inc. on 7/2/2025, Thermometer due on 10/4/2025 confirms the schedule is being followed.

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### 11.2.4 - Pest Prevention

**11.2.4.1** - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

**Response:** Minor



**Evidence:** • During the facility walkthrough, multiple dead insects were noted in various areas of the warehouse near the walls. No product was affected.

**Root Cause:** The seasonal appearance of this type of insect, as well as recent weeding activity in the neighboring lot on the north side of the building, has resulted in increased pest activity in the backyard,

**Corrective Action:** Corrective Action Taken: The following corrective actions were taken: We increased the frequency of spraying the exterior of the building from once to twice a week, starting 7-28-2025, Alternative chemical - Tengard SFR will be used currently as an alternative for other insects, on outside perimeter of building and outside perimeter of fence line, only on extra service days, see attached image #1, Additional temporary devices (insect glue board traps) were placed strategically on 11 locations around the building for additional prevention and better monitoring of the insect activity, placed on 7-28-2025, see attached image #2, with temporary site map and with pictures of temporary glue board locations, We conducted a detailed inspection of the building, and sealed a few small cracks around the junction between the asphalt and the building structure outside, we also sealed the vertical gap on one of the warehouse doors, see attached image #3, The following preventive actions were taken: Sunnyland Mills has established an integrated pest control program, this program is to eliminate any pest activity noted in or around these buildings. Pest control licensed applicator performs regular services at the facility, Insect light traps are stationed inside of building, to monitor flying insect activity, Air curtains are positioned on all doors in the facility to prevent insects from coming into the facility, Detailed inspection, cleaning and maintenance are performed according to established schedules, All employees were instructed that all exterior doors, including roll-up doors, should be kept always closed to prevent the entry of vermin, and other insects,

**Verification Of Closeout:** The facility has submitted picture evidence substantiating the completion of corrective actions undertaken to enhance the integrity of the exterior structure. All identified gaps between the exterior walls and adjacent ground surfaces have been sealed to eliminate potential pest harborage. Additionally, the facility provided a pest control service report confirming that targeted inspection and treatment activities were conducted as part of its integrated pest management program. A.S.

**Completion Date:** July 30, 2025

**Closeout Date:** July 30, 2025

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**11.2.4.2** - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

**Response:** Compliant

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**11.2.4.3** - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

**Response:** Compliant

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**11.2.4.4** - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

**Response:** Compliant

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**11.2.4.5** - Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

**Response:** Compliant

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**11.2.4.6** - No animals shall be permitted on-site in food handling and storage areas.

**Response:** Compliant

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#### Summary -

**Response:** The site has established a documented Pest Prevention Program, referenced as 11.2.4 Pest Prevention, version 13, dated 1/2/2025, which outlines the methods, responsibilities, and maintenance requirements. The program was observed to be effectively implemented. No pest activity was identified or noted during site tours that posed a risk of product contamination. Corrective action and record-keeping procedures are in place to address any pest-related incidents should they occur. Staff awareness of the bait control program and the necessary measures to take upon encountering a bait station are communicated through training. The frequency of pest activity is monitored and trended, with records documented in pest control binder and reviewed on Jan - Jun 2025. The company has internalized its pest control requirement and no longer uses third party company. The frequency of inspection is set on weekly for both interior and exterior. A current and accurate site map, dated 1/2/2025, shows the location of 46 external and 45 internal devices and 5 ILT. The list of chemicals used by the Pest Contractor is available in pest control binder and includes corresponding Safety Data Sheets (SDS). A pesticide application log provides detailed records of all chemical usage and associated dates. PCO is the Commercial Pesticide Applicator, License # 9867 expire 6/30/2027 and indicate employees are trained and competent Inspection activity reports are signed by a management representative following each visit. These reports were reviewed and found to be completed as scheduled. Pesticides are stored separately from other chemicals to ensure safety. Any observations or issues noted by the Pest Contractor are addressed and documented by the site. Additionally, no animals are permitted in food handling or storage areas, maintaining a contamination-free environment. Minor: During the facility walkthrough, multiple dead insects were noted in various areas of the warehouse near the walls. No product was affected. (Section 11.2.4.1).

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### 11.2.5 - Cleaning and Sanitation

**11.2.5.1** - The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

**Response:** Compliant

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**11.2.5.2** - Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

**Response:** Compliant

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**11.2.5.3** - Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the

manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

**Response:** Compliant

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**11.2.5.4** - Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

**Response:** N/A

**Evidence:** • N/A: Clean-In-Place procedures are not carried out at the site.

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**11.2.5.5** - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

**Response:** Compliant

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**11.2.5.6** - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

**Response:** Compliant

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**11.2.5.7** - Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.

**Response:** Compliant

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

**Response:** Compliant

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**11.2.5.9** - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

**Response:** Compliant

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#### **Summary -**

**Response:** The site has a comprehensive Cleaning and Sanitation Program, referenced as 11.2.5 Sanitation Program Content, version 5, dated 6/23/2025, which outlines the methods and responsibilities for cleaning processing equipment, the environment, storage areas, restrooms, and break rooms. Sanitation Standard Operating Procedures (SSOPs) are well-documented, specifying the cleaning tasks, chemical usage (including concentrations), cleaning methods, frequencies, and assigned responsibilities. The verification of sanitation and cleaning activities is designated to Title-here. Approved chemicals, including Caustic soda beads, Quat Guard sanitizer, and Alpet D2 Surface Sanitizer, are listed in the approved chemicals document, 11.6.4.5.vi Sanitation Supply Inventory dated 7/1/2025, properly labeled in accordance with regulations, and supported

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by available Safety Data Sheets (SDS). Cleaning materials are securely stored, accurately labeled, and accompanied by accessible SDS information for all employees. Dispensed cleaning chemicals are adequately stored and identified. On-site mixed cleaning chemicals undergo concentration checks by Sanitors, with the results recorded in Sanitizer Concentration Check List, reviewed records from 3/26/2025 to 7/7/2025. N/A: Clean-In-Place procedures are not carried out at the site. (Section 11.2.5.4). A designated area for cleaning containers, knives, cutting boards, and other utensils is maintained to prevent contamination of food products. Sanitation tasks and pre-operational inspections are conducted by qualified personnel and duly documented. Pre-operational inspection records: Receiving Area, Cleaning Room, and Processing Pre - Operational Check List and Production Pre-Operational Check List for the period of May-Jul 2025 were reviewed, with appropriate corrective actions recorded as needed. A master sanitation plan encompasses all facility areas, specifying the frequencies and responsibilities for deep cleaning. A review of the plan for Jan-Jun 2025 confirmed that cleaning tasks were completed as scheduled. Sanitation personnel are trained in proper cleaning methods and the safe handling of chemicals. The most recent chemical handling training was conducted on 6/20/2025.

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#### 11.3.1 - Personnel Welfare

**11.3.1.1** - Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed. Medical Amendment added: Code Amendment #1A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

**Response:** Compliant

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

**Response:** Compliant

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**11.3.1.3** - Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

**Response:** Compliant

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#### Summary -

**Response:** Employees are prohibited from working in food handling or open food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy, 11.3 Personnel Hygiene and Welfare, version 6, dated 7/8/2025, includes the prohibition of any food handling activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. Medical screen procedure in place.

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#### 11.3.2 - Handwashing

**11.3.2.1** - All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i.

On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

**Response:** Compliant

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**11.3.2.2** - Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

**Response:** Compliant

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**11.3.2.3** - Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

**Response:** Compliant

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**11.3.2.4** - The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.

**Response:** N/A

**Evidence:** • N/A: The facility does not have any high-risk areas.

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**11.3.2.5** - Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

**Response:** Compliant

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

**Response:** Compliant

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#### **Summary -**

**Response:** Handwashing was observed to be required upon entering food handling or processing areas, after toilet visits, after using a handkerchief, after smoking, eating, drinking, and after handling wash down hoses, cleaning materials, or contamination materials. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. N/A: The facility does not have any high-risk areas. (Section 11.3.2.4). Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews conducted with production associates during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and to use proper glove procedures.

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### **11.3.3 - Clothing and Personal Effects**

**11.3.3.1** - The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

**Response:** Compliant

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**11.3.3.2** - Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it

does not present a contamination risk to products.

**Response:** Compliant

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

**Response:** Compliant

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**11.3.3.4** - Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

**Response:** Compliant

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**11.3.3.5** - Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

**Response:** Compliant

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**11.3.3.6** - Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

**Response:** Compliant

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**11.3.3.7** - Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

**Response:** Compliant

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**11.3.3.8** - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

**Response:** Compliant

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#### **Summary -**

**Response:** A policy, based on a documented risk assessment, found in 11.3 Personnel Hygiene and Welfare, version 6, dated 7/8/2025 defines the site's clothing requirements and been implemented. Clothing including shoes are required to be clean at the commencement of the shift and changed or replaced if excessively soiled. Disposable gloves and aprons are to be changed when soiled or damaged. Employees were observed to comply with the clothing requirements of the facility. Protective clothing was observed to be manufactured from materials that will not pose a risk to food safety. A policy defining jewelry use has been written in 11.3 Personnel Hygiene and Welfare, version 6, dated 7/8/2025 and implemented. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management. No exception taken at site.

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

**Response:** Compliant

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**11.3.4.2** - All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

**Response:** Compliant

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**11.3.4.3** - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

**Response:** Compliant

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**11.3.4.4** - Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

**Response:** Compliant

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#### **Summary -**

**Response:** A policy defining visitor and contractor requirements, found in 11.3 Personnel Hygiene and Welfare, version 6, dated 7/8/2025, has been documented and implemented. The policy requires that all visitors be trained in hygiene and food safety requirements before entering food processing or handling areas, or that they be continually escorted while in those locations. The requirements for visitors in those areas include the proper use of access points, hand wash requirements, suitable protective clothing and footwear, removal of jewelry or other loose objects, and an absence of visible signs of illness.

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### **11.3.5 - Staff Amenities (change rooms, toilet, break rooms)**

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

**Response:** Compliant

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**11.3.5.2** - Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

**Response:** Compliant

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**11.3.5.3** - High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

**Response:** N/A

**Evidence:** • N/A: There are no high-risk areas of the facility.

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**11.3.5.4** - Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

**Response:** Compliant

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**11.3.5.5** - Where required, a sufficient number of showers shall be provided for use by staff.

**Response:** N/A

**Evidence:** • N/A: There are no showers needed.

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**11.3.5.6** - Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

**Response:** Compliant

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**11.3.5.7** - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

**Response:** Compliant

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**11.3.5.8** - Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

**Response:** Compliant

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**11.3.5.9** - Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

**Response:** Compliant

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

**Response:** Compliant

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#### **Summary -**

**Response:** Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. Documented cleaning procedures for staff amenities are documented in 11.3 Personnel Hygiene and Welfare, version 6, dated 7/8/2025. There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas. Change rooms are provided. N/A: There are no high-risk areas of the facility. (Section 11.3.5.3). N/A: There are no showers needed. (Section 11.3.5.5). Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. An area has been provided for the storage of outer garments and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with the QC Manager, combined with onsite observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Lunchrooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunchrooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. Outside eating areas are properly maintained to prevent contamination and pest risks. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunchrooms and in or adjacent to outside eating areas where applicable. Lunchrooms were observed to be

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clean and well-maintained during the audit tours.

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#### 11.4.1 - Staff Engaged in Food Handling and Processing Operations

**11.4.1.1** - All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

**Response:** Compliant

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**11.4.1.2** - Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

**Response:** Compliant

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**11.4.1.3** - The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

**Response:** Compliant

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**11.4.1.4** - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment.

**Response:** Compliant

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#### Summary -

**Response:** Food handling procedures, 11.4 Personnel Processing Practices, version 4, dated 7/8/2025, for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited, and no violations were noted. Hair restraints were observed to be worn where the product is exposed. Ingredients were in appropriate, labeled containers and kept off the floor. The GMP policy prohibits smoking, eating, drinking (except for water under acceptable, controlled conditions) or spitting in the facility. Smoking is permitted only in designated areas outside of the facility. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of

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the requirements. The process flow was observed to be logical, with a continuous flow and designed to prevent cross contamination. It was observed during audit tours that the flow of employees is such that any cross contamination is minimal. Wash down hoses were observed to be properly stored on racks when not in use. Sensory evaluations were conducted in designated areas that were well lit and appropriately equipped for that purpose and personnel conducting sensory evaluations are trained and maintain high hygienic standards.

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#### 11.5.1 - Water Supply

**11.5.1.1** - Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

**Response:** Compliant

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**11.5.1.2** - Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

**Response:** Compliant

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

**Response:** Compliant

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**11.5.1.4** - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

**Response:** Compliant

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

**Response:** N/A

**Evidence:** • N/A: Non-potable water is not used at this site.

---

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

**Response:** N/A

**Evidence:** • N/A: Water is not stored on site.

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#### Summary -

**Response:** Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from Municipality. It was determined that there was adequate hot and cold water for cleaning and processing. A documented contingency plan, 11.5.1.2 Water Contingency Plan dated 7/10/2025, was in place should the water supply be contaminated. Back flow devices are installed on water lines. Back flow devices are tested annually, and the last test was conducted on 6/9/2025. N/A: Non-potable water is not used at this site. (Section 11.5.1.5). N/A: Water is not stored on site. (Section 11.5.1.6).

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#### 11.5.2 - Water Treatment

**11.5.2.1** - Water treatment methods, equipment, and materials, if required, shall be designed, installed, and

operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

**Response:** N/A

**Evidence:** • N/A: Water is not required to be treated at the facility.

---

**11.5.2.2** - Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

**Response:** N/A

**Evidence:** • N/A: Water is not required to be treated at the facility.

---

**11.5.2.3** - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

**Response:** N/A

**Evidence:** • N/A: Water is not required to be treated at the facility.

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#### Summary -

**Response:** N/A: Water is not required to be treated at the facility. (Sections 11.5.2.1-11.5.2.3)

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### 11.5.3 - Water Quality

**11.5.3.1** - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

**Response:** Compliant

---

**11.5.3.2** - Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Water used in processing, cooking, cleaning and handwashing is monitored periodically for potability by the site. Samples from inside the facility are sent to an outside lab for analysis. Based on risk, the site's testing frequency is set at a minimum frequency of an annual basis. The last potability test was conducted on 6/6/2025 for HPC and Total Coliform.

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### 11.5.4 - Ice Supply

**11.5.4.1** - Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with

11.5.3.1.

**Response:** N/A

**Evidence:** • N/A: Ice is not used at the facility.

---

**11.5.4.2** - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate.

**Response:** N/A

**Evidence:** • N/A: Ice is not used at the facility.

---

**11.5.4.3** - Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

**Response:** N/A

**Evidence:** • N/A: Ice is not used at the facility.

---

#### Summary -

**Response:** N/A: Ice is not used at the facility. (Sections 11.5.4.1 - 11.5.4.3)

---

### 11.5.5 - Air and Other Gasses

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

**Response:** Compliant

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**11.5.5.2** - Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

**Response:** Compliant

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#### Summary -

**Response:** Compressed air coming in contact with food or food contact surfaces is checked periodically for cleanliness and food safety hazards. Compressed air is regularly maintained and monitored. Filters are located at the point of use and are of the appropriate micron size to effectively filter the air or gas before contacting food or food contact surfaces. The frequency of analysis was documented in and determined to be tested on an annual basis. Records were reviewed for yeast/mold on 6/11/2024 and 6/6/2025, the results were within spec.

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### 11.6.1 - Receipt, Storage and Handling of Goods

**11.6.1.1** - The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals.

**Response:** Compliant

---

**11.6.1.2** - Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

**Response:** Compliant

---

**11.6.1.3** - The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

**Response:** Compliant

---

**11.6.1.4** - Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.

**Response:** Compliant

---

**11.6.1.5** - Where raw materials, ingredients, packaging, equipment, and chemicals 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 are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

**Response:** N/A

**Evidence:** • N/A: Temporary or overflow conditions are not used by the site.

---

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

**Response:** N/A

**Evidence:** • N/A: The site has not used alternate storage or temporary control measures over the timeframe being audited.

---

#### Summary -

**Response:** The site has implemented effective documented storage plan for the storage (including freezer, cooler, and dry warehouse) of raw materials, ingredients, packaging, equipment and chemicals. The 11.6.1 Receipt, Storage and Handling of Goods, version 5, dated 7/11/2025, was reviewed during the audit and found to be acceptable. Stock rotation, based on FIFO and FEFO Method has been implemented by the site to ensure that all materials, including rework, are used within their designated shelf-life. This stock rotation program is documented in 11.6.1 Receipt, Storage and Handling of Goods, version 5, dated 7/11/2025. N/A: Temporary or overflow conditions are not used by the site. (Section 11.6.1.5). N/A: The site has not used alternate storage or temporary control measures over the timeframe being audited. (Section 11.6.1.6).

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### 11.6.2 - Cold Storage, Freezing and Chilling of Foods

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

**Response:** N/A

**Evidence:** • N/A: Cold storage is not required. All products are stored at ambient temperatures.

---

**11.6.2.2** - Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

**Response:** N/A

**Evidence:** • N/A: Cold storage is not required. All products are stored at ambient temperatures.

---

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

**Response:** N/A

**Evidence:** • N/A: Cold storage is not required. All products are stored at ambient temperatures.

---

**11.6.2.4** - Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

**Response:** N/A

**Evidence:** • N/A: Cold storage is not required. All products are stored at ambient temperatures.

---

**Summary -**

**Response:** N/A: Cold storage is not required. All products are stored at ambient temperatures. (Sections 11.6.2.1 – 11.6.2.4)

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### 11.6.3 - Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

**11.6.3.1** - Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

**Response:** Compliant

---

**11.6.3.2** - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

**Response:** Compliant

---

**Summary -**

**Response:** Storage areas for raw materials, packaging and finished goods were observed to be located away from any wet areas, clean and well maintained. The product is protected from contamination, deterioration and pest harborage. Racking is designed and constructed from impervious materials and located so storage areas can be cleaned and inspected.

---

### 11.6.4 - Storage of Hazardous Chemicals and Toxic Substances

**11.6.4.1** - Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

**Response:** Compliant

---

**11.6.4.2** - Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled

(e.g., food versus non-food grade);v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

**Response:** Compliant

---

**11.6.4.3** - Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in-progress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

**Response:** Compliant

---

**11.6.4.4** - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel.

**Response:** Compliant

---

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

**Response:** Compliant

---

**11.6.4.6** - The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

**Response:** Compliant

---

**11.6.4.7** - In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment.

**Response:** Compliant

---

#### **Summary -**

**Response:** Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. A current register of chemicals in the facility, 11.6.4.5. vi Sanitation Supply Inventory dated 7/1/2025, was available. Chemical storage areas were observed to be locked, adequately ventilated, and have appropriate signage. Pesticides are stored separately from cleaning chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility. Training for employees, sanitors, who handle hazardous chemicals and toxic substances were observed to have training records available. SDS and the label declaration and/or documented approval for the chemical's intended use were reviewed for Caustic soda beads, Quat Guard sanitizer, and Alpet D2 Surface Sanitizer.

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### 11.6.5 - Loading, Transport, and Unloading Practices

**11.6.5.1** - The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

**Response:** Compliant

**11.6.5.2** - Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

**Response:** Compliant

**11.6.5.3** - Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

**Response:** Compliant

**11.6.5.4** - Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

**Response:** Compliant

**11.6.5.5** - Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

**Response:** N/A

**Evidence:** • N/A: The site's products are not required to be refrigerated.

**11.6.5.6** - The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit.

**Response:** N/A

**Evidence:** • N/A: The site's products are not required to be refrigerated.

**11.6.5.7** - On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

**Response:** N/A

**Evidence:** • N/A: No refrigerated items are received by the site.

**11.6.5.8** - Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

**Response:** Compliant

#### Summary -

**Response:** A policy defining the practices for loading, unloading and storage of food products has been documented and implemented in 11.6.5 Loading, Transport and Unloading Practices, version 4, dated 7/11/2025. It was observed during the audit tours that food is unloaded, stored and loaded under conditions

that prevent cross contamination. The site's policy requires that all trailers be inspected for cleanliness, infestation, odors, damage, etc. before loading and that vehicles be secured from tampering by use of seal or other agreed method. Trailer inspections records were reviewed for 7/10/2025, 7/3/2025, 6/24/2025, 6/12/2025, 5/28/2025, 5/21/205. N/A: The site's products are not required to be refrigerated. (Sections 11.6.5.5 - 11.6.5.6). N/A: No refrigerated items are received by the site. (Section 11.6.5.7).

---

#### 11.7.1 - High-Risk Processes

**11.7.1.1** - The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized.

**Response:** N/A

**Evidence:** • N/A: The site does not produce high risk products.

---

**11.7.1.2** - Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.

**Response:** N/A

**Evidence:** • N/A: The site does not produce high risk products.

---

**11.7.1.3** - Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.

**Response:** N/A

**Evidence:** • N/A: The site does not produce high risk products.

---

**11.7.1.4** - Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.

**Response:** N/A

**Evidence:** • N/A: The site does not produce high risk products.

---

**11.7.1.5** - Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.

**Response:** N/A

**Evidence:** • N/A: The site does not produce high risk products.

---

#### Summary -

**Response:** N/A: The site does not produce high risk products. (Sections 11.7.1.1 – 11.7.1.5)

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#### 11.7.2 - Thawing of Food

**11.7.2.1** - Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed.

**Response:** N/A

**Evidence:** • N/A: The facility does not require thawing of any product.

---

**11.7.2.2** - Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

**Response:** N/A

**Evidence:** • N/A: The facility does not require thawing of any product.

---

**11.7.2.3** - Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

**Response:** N/A

**Evidence:** • N/A: The facility does not require thawing of any product.

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#### **Summary -**

**Response:** N/A: The facility does not require thawing of any product. (Sections 11.7.2.1 - 11.7.2.3)

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### **11.7.3 - Control of Foreign Matter Contamination**

**11.7.3.1** - The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

**Response:** Compliant

---

**11.7.3.2** - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

**Response:** Compliant

---

**11.7.3.3** - Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

**Response:** Compliant

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**11.7.3.4** - Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

**Response:** Compliant

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

**Response:** Compliant

---

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

inspection.

**Response:** Compliant

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

**Response:** Compliant

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**11.7.3.8** - Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

**Response:** Compliant

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**11.7.3.9** - Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

**Response:** Compliant

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#### Summary -

**Response:** 11.7.3 Control of Foreign Matter Contamination, version 6, dated 6/18/2025 defines the methods and responsibilities to prevent foreign material contamination. The policy's implementation was demonstrated by inspections and regularly scheduled maintenance inspections, that are conducted and documented for the condition of equipment and any potential contaminants. A glass register has been documented with glass, brittle plastic and ceramic sources included in all areas of the plant. The glass register is current as of 7/14/2025. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted on 7/14/2025 and 4/28/2025 was reviewed and found to be completed as scheduled, quarterly. The site's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection (including of cleaning equipment and footwear) occur if a glass breakage were to occur. A responsible person, QC Manager, is required to inspect the affected area before the restarting of production. Wood pallets were clean and in good condition, and the facility has a policy prohibiting and/or controlling wooden utensils in processing/food handling areas. The site has documented a knife policy, and knives are controlled, cleaned and required to be in good condition. Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate are inspected during PMs.

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### 11.7.4 - Detection of Foreign Objects

**11.7.4.1** - The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

**Response:** Compliant

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**11.7.4.2** - Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

**Response:** Compliant

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**11.7.4.3** - Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

**Response:** Compliant

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**11.7.4.4** - Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.

**Response:** Compliant

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**11.7.4.5** - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

**Response:** Compliant

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#### Summary -

**Response:** The policy, 11.7.4 Detection of Foreign Objects, version 6, dated 6/18/2025, defining the methods and responsibilities for the use of foreign material detection and removal devices has been documented and implemented. The devices used in the facility include Screen, Metal Detectors, and Magnets. Metal detectors are routinely monitored and verified by operations personnel. Demonstration and documentation of the devices were observed during the audit tours. Interviews with production associates responsible for the monitoring indicated they were knowledgeable and understood what to do if the devices failed when tested with known samples. Metal detectors were observed to stop the process line. Records reviewed for Metal Detector Portable conveyor system checks 5/1/2025 - 5/30/2025, 6/2/2025 - 6/27/2025 demonstrated the site was verifying the functioning of these devices, documenting any objects rejected or removed by them and implementing corrective actions.

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### 11.8.1 - Waste Disposal

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

**Response:** Compliant

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

**Response:** Compliant

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**11.8.1.3** - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

**Response:** Compliant

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**11.8.1.4** - Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

**Response:** Compliant

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**11.8.1.5** - Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.

**Response:** Compliant

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**11.8.1.6** - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

**Response:** Compliant

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

**Response:** N/A

**Evidence:** • N/A: The site does not supply waste materials for animal feed.

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**11.8.1.8** - Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

**Response:** Compliant

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**11.8.1.9** - Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

**Response:** Compliant

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**11.8.1.10** - Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

**Response:** Compliant

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#### **Summary -**

**Response:** The policy, 11.8 Waste Disposal, version 6, dated 6/25/2025, defines the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas on the interior and exterior of the facility were observed to be well-maintained and clean. Solid waste from processing was observed to be properly disposed of. Wastewater is discharged to plant drains and collected for disposal to the municipality's wastewater system. A documented statement is in place to ensure controlled disposal of trademarked materials where required, including a review of any contracted disposal services. N/A: The site does not supply waste materials for animal feed. (Section 11.8.1.7).

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