Expectations Manual

HACCP VERIFICATION

HACCP VERIFICATION AUDIT Expectations Manual for Food Manufacturing and Food Packaging Facilities: Version 2.0

SAI GLOBAL

HACCP VERIFICATION AUDIT: EXPECTATIONS MANUAL FOR FOOD MANUFACTURING AND FOOD PACKAGING FACILITIES: VERSION 2.0

The following requirements outline the management programs and performance criteria expected of a modern food manufacturing or food packaging processing facility to meet the food safety needs expected by the consuming public, many retail and foodservice buyers, and regulatory agencies. The manufacture and delivery of safe, wholesome, and high-quality foods, food products and food contact food packaging materials requires a dedicated effort of knowledgeable food professionals who understand processes from ingredient sources through the manufacturing, distribution, and sale of the food and food packaging products. While food safety programs are the hallmark of modern food and food packaging manufacturers, high quality is the essential ingredient to ensure success with the consumer. Reliable food manufacturing systems with a disciplined and knowledgeable work force that fully understand both food safety and consistent quality are necessary to compete in today's market.

TABLE OF CONTENTS

PREFACE

The following criteria are considered essential to meeting these goals on a consistent basis. Of course, the bar is continually being raised as leading companies, not just large companies, work to improve their level of performance to provide reliable, safe and high-quality products. Demonstrating consistent achievement of these criteria is the expectation of SAI Global Limited (SAI Global).

This criteria document describes the content and requirements of SAI Global's HACCP VERIFICATION AUDIT. This audit evaluates the adequacy of documentation, compliance to documented procedures, effectiveness of these procedures to control the process within defined limits, and the ability to implement corrective and preventive action plans.

Specifically, this audit evaluates:

- Compliance to United States or local regulatory standards
- Compliance to regulations imposed by foreign governments for product exportation, where applicable
- Adherence to specific client and/or internal specifications
- Adherence to specific and/or internal policies and procedures
- Ability to successfully execute a product recall

DEFINITIONS

Allergen

Food compounds that can cause an allergic or food intolerance response in sensitive individuals. Food allergens elicit serious adverse reactions in some individuals. Allergic individuals can tolerate very little of the offending food. Allergens of regulatory significance in the U.S. include peanuts, tree nuts, eggs and egg products, milk and milk products, soy and soy products, wheat and wheat products, fish, and shellfish (i.e., crustaceans -shrimp, lobster and crabs). In Canada, sulphites of over ten ppm, shellfish- oysters, clams and mussels, sesame seeds and mustard are also considered allergens. The plant shall identify all allergens present in the facility and shall have a written program that will prevent cross-contamination of undeclared allergens (see Sensitive Ingredients).

Calibration of Inspection, Measuring and Test Equipment

The facility shall establish and maintain documented procedures to control, calibrate and maintain inspection, measuring, and test equipment (including test software) used by the facility to demonstrate the conformance of product to the specified requirements. Inspection, measuring, and test equipment shall be used in a manner to ensure that the measurement uncertainty is known and is consistent with the required measurement capability. Calibration against an accepted industry standard or certified standard shall be conducted at a frequency sufficient to confirm acceptability based on manufacturers' recommendations.

Correction

Actions, adjustments, or modifications taken by the client during the audit as a result of an audit finding by the auditor. This correction is generally in response to a finding of a non-conformance, but can be taken at the finding of an opportunity for improvement as well. These actions, when observed by the auditor, will be included within the audit report.

Corrective Action

Corrective action shall be documented for any negative finding reported on a regulatory review, internal assessment, customer complaint or third- party audit finding. The procedures for corrective action shall include:

- Investigation of the cause of the negative finding or complaint. It is important that the root cause of the issue is identified so that adequate improvements can be identified and implemented. Some examples of causes may be lack of training, equipment failure, failure to follow procedure, etc.
- Determination of the corrective action needed to eliminate the cause of non-conformities and the prevention of its reoccurrence.
- Application of controls to ensure that corrective action is taken and that the corrective action is effective to prevent reoccurrence of similar problems.
- Determination of appropriate disposition of non- conforming or affected product.

Cross Contact

The actual or potential contamination of non-allergen containing product or ingredients with allergen containing product or ingredients. Cross contact can also occur with the contamination of non-like allergens as well, such as peanut contamination of a milk-based product.

Cross Contamination

The actual or potential pathogenic contamination of a product or ingredient that has undergone an intervention step (e.g., cooking or washing) to reduce the microbiological level (bacteria, viruses and/or parasites) of the product or ingredient with a raw product or ingredient that has not undergone the intervention step. The presence of foreign material or non-potable water in finished or Ready-To-Eat (RTE) product.

Customer
The retail, foodservice, distribution or manufacturing buyer that is a user of the information obtained during the audit for the purpose of supply chain management. Generally, the customer is not the responsible party for payment of the audit, thus for those customers they must only be given access to the audit information by the authorization of the client.

Document and Data Control
The system for the management, development, revision, correction and storage of all documents, programs, specifications, procedures, forms and records that are used by the facility to manage its food safety and quality management systems.
This system would include an identification system, an approval system and accessibility requirements for records. This system may be electronically managed, if password protected, or completed manually.

Good Manufacturing Practices (GMPs)
Guidelines as cited in Code of Federal Regulation FDA 21 Part 117 and USDA 21 CFR 9 and CFIA.

Hazard Analysis Critical Control Point (HACCP) Definitions.

CCP Decision Tree – A sequence of questions to assist in determining whether a control point is a Critical Control Point (CCP).

Control – (a) To manage the conditions of an operation to maintain compliance with established criteria. (b) The process states where correct procedures are being followed and criteria are being met.

Control Measure – Any action or activity that can be used to prevent, eliminate or reduce a significant hazard.

Control Point – Any step in the process at which biological, chemical or physical hazard can be controlled, reduced or eliminated.

Corrective Action – Documented procedures followed when a process or product deviation occurs.

Criterion – A requirement on which a judgment or decision can be based.

Critical Control Point – A step at which control can be applied and is essential to prevent or eliminate a food safety hazard likely to occur or reduce it to an acceptable level.

Critical Limit – A maximum and/or minimum value to which a biological, chemical or physical parameter shall be controlled at a CCP to prevent, eliminate or reduce to an acceptable level the occurrence of a food safety hazard reasonably likely to occur.

Deviation – Failure to meet a critical limit.

HACCP – Hazard Analysis Critical Control Point. A systematic approach to the identification, evaluation and control of food safety hazards reasonably likely to occur.

HACCP Plan – The written document that is based upon the principles of HACCP and that delineates the procedures to be followed.

HACCP System – The result of the implementation of the HACCP plan.

HACCP Team – The group of people representing the plant management, technical and food safety experts, manufacturing, maintenance, engineering and others who are responsible for developing, implementing and maintaining the HACCP system.

Hazard – A biological, chemical or physical agent that is reasonably likely to cause illness or injury in the absence of its control.

Hazard Analysis – The process of collecting and evaluating information on hazards associated with the food under consideration to decide which are significant and shall be addressed in the HACCP plan.

Monitor – To conduct a planned sequence of observations or measurements to assess whether a CCP is under control and to produce an accurate record for future use in verification.

Pre-requisite Programs – All procedures used in the facility, which address operational conditions providing the foundation for the HACCP system.

Severity – The seriousness of the effect(s) of a hazard.

Step – A point, procedure, operation or stage in the food system from primary production to final consumption.

Validation – That element of verification focused on collecting and evaluating scientific and technical information to determine if the HACCP plan, when properly implemented, will effectively control the hazards reasonably likely to occur.

Verification – The application of methods, procedures, tests and audits, in addition to monitoring, to determine compliance with the HACCP plan.

Hold

Product that has been identified as non-conforming or awaiting disposition and has been placed in a do not use status.

Internal GMP Audit

An effort to evaluate the performance of the facility in regards to good manufacturing practices and other established company protocols by internal staff. These audits assess internal and external facilities and the results are utilized to drive continuous improvement.

Mock Recall

An evaluation of the company's product recall system that tests the effectiveness of the identification of affected product and the communication tools with key stakeholders.

Pre-Requisite Programs

Supplemental programs to the HACCP program required for the total food safety management by the facility of its product and production.
Examples include pest management, training, maintenance, allergen management, food defence, etc. Further examples are described later in this manual.

Primary Packaging

The packaging material that comes into direct contact with the food product.

Process Control

The features or mechanisms that control the execution of a process. These control mechanisms ensure a process is conducted to maximum cost effectiveness through effective set-ups and ongoing measures.

Product Traceability

The linking of all identified raw materials, primary packaging, processing aids, rework and work in progress to a finished product through a coding, identification or tracking system.

Program

Documented policies, procedures, tasks or activities that describe specific functions within the facility.

Ready-To-Eat (RTE) Products

All foods that, when purchased by the consumer, do not require any further preparation i.e. pathogen elimination step prior to consumption (i.e. cooking).

Products that are required to be cooked prior to consumption shall have detailed cooking instructions on the outer case for foodservice products, or on the individual inner packages for retail packaging, to heat product to a minimum internal temperature per regulation (review Model Food Code, 2017 edition, Chapters 3-4).

Repack

Moving a unit of product from one outer case to another outer case that requires labelling linked to the original product lot code.

Rework

Product that has been recovered or rejected from normal production and has been reprocessed, re-blended, or reformatted into the finished product.

Risk

The likelihood that a food safety hazard will happen and the severity if it did.

Sensitive Ingredients

Food intolerances affecting a limited number of individuals that do not involve immunologic mechanisms (e.g., sulphites (allergen considers these an allergen), MSG, FDC colors Yellow #5 and #6).

For the most part, sensitive ingredients involve less severe manifestation and allergic individuals can tolerate limited quantities of the offending food (see Allergen).

Standard Operating Procedure (SOP)

A series of signed, detailed documents that specifically define how an individual job function or activity will be performed.

HISTORY OF HACCP

Hazard Analysis and Critical Control Points (HACCP), is a methodical and systematic application that can be utilized to in management systems to prevent adverse conditions from occurring in the food industry.

The origin of HACCP dates back to 1959, where it was developed by the Pillsbury Company, US Army Laboratory, and NASA to ensure that food manufactured for space was void of any potential biological hazards that could results in a foodborne illness, and additionally to produce a meal that would be feasible to eat under zero gravity conditions. The precise measurements and process in this manufacturing operation lead scientists to the creation of 'Critical Control Points' or (CCPs) which incorporated targeted focus on all factors of the manufacturing process including raw material supplies, ingredients, and product flow hazards to prevent food safety hazards from occurring.

Over the course of next 4 decades, through refinement, and international development, and largely in parts of the efforts of National Advisory Committee on Microbiological Criteria for Foods (NACMCF) and CODEX Alimentarius Committee on Food Hygiene, the modern HACCP principles and guidelines took to International acceptance has a fundamental way to ensure the manufacturing of safe food.

IMPLEMENTING HACCP: FUNDAMENTAL REQUIREMENTS & PRE-REQUISITE PROGRAMS

The initial task for food and food packaging manufacturers is to develop and implement foundational programs to operate effectively. The creation of Pre-Requisite Programs provide the basic requirements for sanitary and operational support in the manufacturing of safe, wholesome food products.

Pre-Requisite Programs include:

- Good Manufacturing Practices (GMPs)
- Sanitation Standard Operation Procedures (SSOPs)
- Training and Education for Team Members across all levels of the organization

A deeper dive into each of the pre-requisite types can be broken down further to demonstrate specific programs pertinent to a food operation. Below is a potential list of pre-requisite programs essential for a food and food packaging manufacturer:

- Facility and Grounds- design, sanitary conditions, cleanable surfaces, appropriate ventilation, adequate lighting, chemical controls, pest controls, potable water suppliers.
- Hygienic Practices for Personnel- sanitary and adequate restrooms, handwashing protocols, proper attire, prohibiting food and drink in production areas, hair and jewellery restraints, disease control
- Sanitary Operations- master sanitation schedule and cleaning procedures, receiving/storage and distribution
- Process Controls- supplier approval programs, complaint management, glass and brittle plastic control, foreign material controls, traceability, and recalls
- Training- training of food safety awareness, GMP procedures, technical procedures, quality, food defense practices

It is important to note that pre-requisite programs must be fully documented procedures with monitoring and verification measures to ensure that activities are being performed, and the system is being maintained to serve as support for validation for the site's controls of low risk hazards that may be identified in the HACCP Plan.

IMPLEMENTING HACCP: FUNDAMENTAL REQUIREMENTS & UNDERSTANDING HAZARDS

The concept of HACCP relies on understanding the potential biological, physical, and chemical food safety hazards that could occur during each step of the food manufacturing process and how an establishment can prevent or control the hazard before it reached a critical level and potentially create an unsafe food product. It is crucial for a food and food packaging manufacturer to fully understand and define biological, physical, and chemical hazards.

Biological Hazards are associated with microorganisms that are present, or grow under certain conditions in food products and on food surfaces, they include: bacteria, viruses, protozoa, yeasts, molds, and prions. Some biological hazards are of pathogenic nature, inducing food borne illnesses upon consumption for consumers. They represent the largest group of reported hazards and food 'outbreaks' than any other hazard.

There are seven (7) fundamental principles to the HACCP system that will outline the steps for food manufacturers to take in creation of the systematic plan for food safety:

1. Hazard Analysis and Control Measures
2. Determine Critical Control Points (CCPs)
3. Establish Critical Limits
4. Establish Monitoring Procedures
5. Establish Corrective Actions
6. Establish Verification Procedures
7. Establish Recordkeeping and Documentation Procedures

This audit will determine compliance with the HACCP System's seven (7) principles, and the pre-requisite programs that have been implemented to ensure food safety.

RATINGS

RATING CRITERIA	POINTS
COMPLIANT- defined as the facility fully meeting the established SAI Global criteria, facility is able to demonstrate full implementation of the criteria, employees are aware and in compliance.	A 'compliant' rating achieves the full amount of potential points to the question. Each question is rated at 10 points.
MINOR NON-CONFORMANCE- defined as an isolated occurrence of the observation (1 or 2 instances), elements missing from records or programs, some inconsistency with document vs. actual practice.	A 'minor non-conformance' rating results in a deduction of 5 points from the question.
MAJOR NON-CONFORMANCE- defined as a systemic failure of the question: no program in place, employees unaware of non-compliances, more than 3 observations of the same audit line item violation, or the potential for a direct food safety incident based on the observation.	A 'major non-conformance' rating results in a deduction of 10 points from the question.
N/A- would be used by the auditor for any question the auditor determines is not applicable for the facility being audited.	A 'N/A' rating results in no points achieved or deducted from the question.

RATING SCALE

The final score of the audit is a sum of all total points including any points deducted. The following chart below captures the audit rating in comparison to the percentage compliance received after the total audit points have been calculated.

Rating	Start	End
Superior	98	100
Excellent	94	97.99
Good	89	93.99
Compliant	80	88.99
Fail	0	79.99

CORRECTIVE ACTION MANAGEMENT

The new version of the SAI Global HACCP Verification audit will include corrective action responses for minor and major non-conformances identified at the time of the audit.
The purpose of corrective action management is to ensure the site investigates and corrects non-conformances found by the auditor.
The site will be able to provide corrective actions to all non-conformances found during the audit through SAI Global's SAIGOL platform.
Once your audit has submitted by the auditor, you will receive an email indicating your overall audit
rating and a link directing you to the non-conformance management portal.
a. You do not need login information for this portal, just simply click on the link provided.
b. Only Non-conformances with a request for more details will appear in these pages.
2. Once you enter the portal, you will see your open non-conformances, displayed in order of appearance in the audit
checklist.
a. To view the non-conformances by severity, click the and choose the severity level
3. Select the non-conformance you will be adding your corrective action evidence to. Add any comment in the comment
box, then click to have them added to the record.
4. To add supporting documents, click on . Browse to the document you wish to upload and click, SAVE. Then click close. Repeat this step for any other documents that need to be added. Note: attachments cannot
exceed 7MB in size.
Response for each non-conformance must include root cause evaluation findings, description of the correction, who
completed it, and when it was completed, along with upload of evidence of correction. Evidence can include photographs
for physical activities, and documents and/or records, depending on the non-conformance. If an existing document was
revised to add something as a corrective action, BE SURE TO HIGHLIGHT the portion of the document which addresses the
non-conformance before uploading. Also ensure all submitted evidence is in English.

Timeline for Corrective Action submittal is 30 days from email notification.

An electronic instruction procedure will be provided to each site to ensure ease of access to the corrective action portal.

REQUIRED DOCUMENTATION

In preparation for the HACCP Verification the site should prepare the following documentation to aide in audit efficiency and aiding in site compliance to the audit questions:

DOCUMENT/POLICY	√	DOCUMENT/POLICY	√
HACCP PLAN:		Pre-Requisite PROGRAMS:	
Product Description		Training Records	
Intended Use/Consumers		Pest Prevention Management	
Product Distribution		Sanitation Procedures	
Flow Diagram		Supplier Approval Program	
Hazard Analysis		Approved Chemical Policy	
CCP Determination/Decision Tree		Shipping, Receiving and Storage Program	
Critical Limit Determination and Validation		Complaint Program	
Monitoring Procedure for CCPs		Non-Conforming Product-'HOLD' program	
Corrective Actions for CCPs		Allergen Control Program	
Verification Procedures		Glass and Brittle Policy	
Calibration Procedures		Food Defense Policy	
Recordkeeping Procedures		Product Recall/Traceability Program	
Minimum of 90-day records of all HACCP related documents			

SECTION REQUIREMENTS AND GUIDELINES

Section 1: Plan Identification, HACCP TEAM, and SCOPE *Requirements*
The site should ensure that the HACCP Plan clearly identifies the products, groups, services manufactured at the facility. The plan must include the company's legal name and address/location in which the HACCP plan covers. The HACCP Team should consist of multi-disciplinary members with knowledge or expertise of the product within the scope of HACCP Plan. The HACCP plan should include the name, title, and experience of each HACCP Team member.

Section 2: Product Description/Specifications *Requirements*
The product description should include the following information: common/product name, final product state (ready to eat, raw, etc.), product ingredients and composition, general processing methods, shelf life, storage conditions, lot coding information, cooking instructions, safe handling instructions and methods of distribution.

Section 3: Intended Use and Consumers of the Product *Requirements*
The HACCP Plan should include the intended use of the final product manufactured at the facility. Examples of intended use are as followed: retail use, further processing, food service.

If the site is producing a product that could have alternate uses which outside the intended use, the site shall take this into consideration. An example of this would be 'raw cooking dough' where the intended use is to cook fully; however, it is known that raw cooking dough is sometimes consumed by consumers. Additionally, the site should include if the intended use may be unsafe for certain populations of consumers. The site should include the consumption of products to immunocompromised, elderly, food allergies, or other intolerances and sensitivities that may be unsafe to consume.

Section 4: Flow Diagram: Development, Review and Approval

Requirements

The site should create a flow diagram that outlines each step of the process for the product manufactured at the location. The flow diagram should include a detailed layout of all raw materials, ingredients, packaging materials, processing aids, utility inputs, and all storage locations through the receiving process until final product shopping or storage. It is important that a flow diagram be designed clearly and have concise detailing of all product flow steps. The CCP steps should be documented in the flow diagram. Lastly, the flow diagram should be signed and dated by the HACCP Coordinator for approval.

Section 5: Principle 1-Hazard Analysis and Control Measures

Requirements

A thorough hazard analysis should be completed at each process step that identifies the potential introduction or presence of a biological, physical, or chemical hazard; the hazard that has been identified should be definitive. For example, if a biological hazard has been identified, it is unacceptable to state 'pathogens'-the pathogen of concerned must be named such as *Salmonella spp.* or *Listeria spp.* For each hazard identified, the HACCP Team should assess the likelihood of occurrence, and if a control measure is warranted through a pre-requisite program or critical control point. Lastly, if control measures have been put into place at a step where the likelihood of occurrence has been identified, the control measures must be appropriate in controlling the hazard.

Section 6: Principle 2- Determining Critical Control Points

Requirements

To aid in the determination of CCPs, a decision tree will guide hazards reasonably likely to occur based on the outcome of the hazard analysis in the previous principle. A decision tree will narrow each control point to the following 3 questions*:

1. Does the step involve a hazard of sufficient likelihood of occurrence and severity to warrant its control?
2. Does a control measure for the hazard exist at this step?
3. Is control at this step necessary to prevent, eliminate, or reduce the risk of the hazard to consumers?

Section 7: Principle 3- Establishing Critical Limits

Requirements

At each control measure step, critical limits must be established. A critical limit is a maximum and/or minimum value to which a biological, chemical, or physical parameter must be controlled at a CCP to prevent, eliminate, or reduce the occurrence of a food safety hazard to an acceptable level. The HACCP Plan must include information on how the critical limit was

determined for the process. Sources that can aid in setting accurate critical limits are as followed: scientific journals, in plant experiments and studies, industry standards, regulatory guidelines, equipment manufacturers guidelines, and other scientifically sound research that identify the control of the hazard identified.

Section 8: Principle 4- Establishing Monitoring Procedures *Requirements*
Monitoring Procedures shall be documented for each critical limit step identified in the hazard analysis. The monitoring procedure shall include specific information on what will be monitored, how it will be monitored, when it will be monitored, and who will perform the monitoring.

Section 9: Principle 5- Establishing Corrective Actions *Requirements*
The HACCP Plan must include a corrective action procedure for deviations from the critical limit. The corrective action procedure shall include the details for the affected product, root cause of deviation, preventative measure to prevent recurrence, and product disposition. The corrective action plan shall include who at the facility will have the responsibility to oversee that the corrective actions have been performed in accordance with the written procedure and that all affected product has been verified as safe to release or if affected product must be destroyed as a result of the critical limit deviation. A reassessment of the HACCP Plan may be required after a deviation from the critical limit has occurred. Reassessment and Corrective Action records must be on file.

Section 10: Principle 6- Establishing Verification Procedures *Requirements*
The HACCP Plan should include verification procedures to ensure the HACCP Plan is operating effectively, and in accordance with the documented procedures. Verification activities would include all critical control points, pre-requisite programs, and review of the entire HACCP Plan and system. Verification activities shall be at a prescribed frequency and performed by a team member independent of the monitoring. All verification records shall be retained for review.

Section 11: Principle 7- Establishing Recordkeeping and Documentation Procedures *Requirements*
The site should ensure to retain all records of monitoring procedures, corrective actions, pre-requisite programs, verification activities, HACCP reviews, and initial and reassessed HACCP Plans. Time of retention may vary depending on regulatory authority; however, a minimum of 2 years or greater is standard, and would depend on the shelf life of the final product.

Section 12: Pre-Requisite Programs to the HACCP Plan *Requirements*
Ground and Facilities: The site should ensure that all grounds are kept in sanitary condition and in good repair including the exterior and interior of the manufacturing location. The facility shall ensure that ceilings, walls, floors, window, doors, and equipment are in good repair, and maintained in a manner to prevent possible contamination. All interior surfaces shall be constructed of a surface that is able to be cleaned. The traffic flow of employees and product shall be designed to ensure there is no cross contamination of operations from dirty location

(less than daily sanitation) to clean location (daily sanitation).

Sanitation: The facility shall develop written sanitation procedures to include the description of all cleaning activities, including chemical and sanitizer usage, and frequency of sanitation. The site shall develop a master sanitation schedule to ensure sanitary tasks are being completed in the set frequency and are verified for completion and effectiveness. The site shall include pre-operational inspection verification records, and environmental monitoring to ensure no additional hazards are being introduced as a result of the sanitation process.

Supplier Approval: The facility must have an approved supplier program outlining requirements for its specific facility (note: this includes facilities where the corporate office develops the supplier program). The facility should outline how it will implement and facilitate the requirements. The program must include all raw material, ingredients, processing aids, and packaging materials.

Training: Documents must be available to demonstrate management's commitment to a planned training program for both management and food production personnel. The following must be included in the management program:

The formalized program must include introductory training programs for new management and new operating personnel. The training policy must address the communication of basic food handling, sanitation, food defence, refresher training for experienced employees, and specific training for identified jobs, such as oven operators, HACCP Critical Control Point monitoring, or Food Safety Plan monitoring responsibilities. This program must be reviewed and revised annually, to ensure that management and supervision are aware of new food safety issues and control programs.
Training programs shall be given to all employees, including new employees, temporary employees and contract employees in the appropriate languages reflecting the work force population. A method to document understanding, typically testing or performance evaluations shall be an integral part of the training program.

Good Manufacturing Practices/Employee Hygiene: The facility must have a plant-specific, documented GMP training program for all employees. All new employees (e.g., seasonal, part-time, contract) must be provided initial training covering basic GMPs and specific plant policies regarding sanitation, housekeeping and personal hygiene. The program should specifically cover: good manufacturing requirements and regulatory basics, personal dress, hand sanitation and grooming requirements, plant sanitation policies and procedures, food safety (HACCP/FSP) and quality control policies, and product tampering awareness and consequences. Training shall be conducted in an effective manner and be in the appropriate language. Follow-up, continuing refresher training shall be provided annually, at a minimum. Special training to address operational deficiencies must be provided as required.

Pest Prevention: A written detailed pest management policy and program must be available. The policy shall outline and describe all procedures required to ensure that activities conducted by the Pest Management Provider (PMP) and trained employees are carried out in accordance with the prescribed policy. A plant-specific pest management manual shall be current and updated at least annually. Management of the pest management program shall be assigned to a qualified and trained company employee. The policy shall identify forms used by the PMP.

The activity/action reports shall document what chemicals are used, if any, where, why, and with relevant observations of activity. Site maps for traps, glue boards and bait stations shall be reviewed regularly, dated and initialled by the person having responsibility for the program.

Chemical Control: The facility must ensure that all chemicals used in the cleaning process are approved for use in a food establishment. The facility must ensure that only trained individuals are allowed access and handle chemicals. These individuals must have required Material Safety Data Sheets (MSDS) statements and Personal Protection Equipment (PPE) present for use with all chemicals.

Allergen Control: In facilities where allergens or sensitive ingredients are used or stored and there is a potential for cross contact, there must be detailed procedures to prevent the contamination of other products. In the U.S. the eight allergens recognized are milk, pea nut, soy, tree nuts, wheat, eggs, fish, and crustacean (lobster, crab and shrimp). Sulphites of over ten ppm, shell fish (oysters, clams and mussels), sesame seeds and mustard are also considered allergens by the Canadian Food Inspection Agency (CFIA) in Canada. Any additional allergens may need to be considered depending on the area to which the facility exports product.

Glass/Brittle & Foreign Material Control: The facility must outline how the potential hazards associated with glass and/or brittle plastics will be managed throughout the process. The program must include communication of such hazards to all within the organization (including a policy of items prohibited from the production facility). The program must also identify all glass and brittle plastic that is present in the facility and the frequency with which it is inspected.

Shipping, Receiving & Storage: The facility must have a written inspection program for all inbound and outbound carriers that fully describe acceptable and/or unacceptable conditions. For contracted carriers in which each vehicle is not inspected, there must be written specifications to that contracted carrier including any specific sanitary requirements for the vehicle and transportation equipment, as well as any cleaning procedures. The specifications must also include temperature requirements for the food being received/shipped including pre- cooling phase where applicable. The facility must have policies and procedures outlining how they protect product throughout the process while being stored.

Customer Complaints: The facility must have a written program for handling customer or consumer complaints. The policy must address responsibilities, response time, and corrective actions based on an investigation of the complaint. A log is essential to track complaints by product identification, production dates, cause and origin of complaint. Customer information can be a valuable resource for validating HACCP criteria and, to that end, should be used as part of the continuous improvement program as well.

Out of Flow Product/HOLD Procedures: The facility shall have outlined procedures for placing materials/product on hold. The procedure shall identify the segregation process, identification of hold products, physical location of hold products, and who is authorized to release any materials/product placed on hold. Records for decision and disposition should be kept on file.

Recall Plan/Traceability: The facility's program must identify the recall team members and describe each team member's responsibilities. Current office and after-hour telephone contact numbers and email addresses of all recall team members, both at the plant and head office, if appropriate, must be available to all team members. The facility must also include notification procedures, including contact lists and customer and regulatory contacts. The facility's program must include conducting mock recalls on an annual basis. The program must include performance standards set (note: industry best practice has been set at recovery of 100+/-2 % of suspected product within four hours). Involvement of entire team in mock recalls is expected. A management review must be conducted after the exercise is completed and should include documented results of level of success and recommendations for any necessary improvements.

Food Defense: The facility must develop a food defense program outlining the site's food defense procedures and strategies. The program must include clearly defined roles and responsibilities of those individuals responsible for maintaining the program and addressing access to the facility, visitors, raw materials, security inspections, employee identification and other appropriate food defence requirements per local regulation. The program must be communicated throughout the organization and reviewed on an annual basis, and or when an incident occurs or when changes are required.