Company Number: 9400
Audit Number: 3864711

SQFI Audit Report Edition 9

I. Company Information

Company Name	Adelphia Seafood			**Company #**	9400
Address	3024 Penn Ave				
City	West Lawn	**State**	Pennsylvania	**Zip Code**	19609
Country	United States	**Phone #**	610-670-2500		
Primary Contact	John Williams	**Email**	jwilliams@adelphiaseafood.com		
Food Sector Categories	09 - Seafood Processing 20 - Recipe Meals Manufacturing				
Modules Audited	GMP for Processing of Animal Products Module 9 Food Manufacturing Module 2 GMP for Processing of Food Products Module 11				
Certified Products	Seafood processed seafood products				

II. Certification Body

Certifying Body	NSF Certification LLC			**CB #**	CB-1-NSF
Address	789 N. Dixboro Rd.				
City	Ann Arbor	**State**	MI	**Zip Code**	48105
Country	United States of America	**Phone #**	(734) 769-8010		
Accreditation Body	ANSI Accreditation Program	**Accreditation Number**	1181		

III. Audit Schedule

Certification Type	Recertification	**Audit Level**	HACCP-Based Food Safety
Start Date	10/Sep/2024 07:55:00 AM	**End Date**	11/Sep/2024 04:55:00 PM
Scope of Certification	Exclusions: Scope: Seafood processing		

IV. Audit Team

First Name	Last Name	Person #	Role
Shelly	Hoppe	201076	Lead Auditor

V. Audit Duration

Actual Start Date	10/Sep/2024 07:55:00 AM	**Actual End Date**	11/Sep/2024 04:55:00 PM

Hours Spent on Site	15	**Hours Spent Writing Report**	8
Hours of ICT Activites	N/A		

VI. Certification Decision

First Name	**Last Name**	**Person #**	**Role**
Robert	Helgerson	9258	Technical Reviewer
Certificate Decision Date	29/Sep/2024	**Certificate Issue Date**	30/SEP/2024
Audit Score	97	**Audit Rating**	Excellent
Certification #	T5028-SQF11		
Re-certification Date	24/SEP/2025	**Expiration Date**	08/DEC/2025
Surveillance Audit Due Date		**Certification Decision**	Certified

VII. Non-Conforming	
	Evidence
Clause	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	Minor
Evidence	During document review for the End of Day Checklist, the forms for August 31, 2024 and September 1, 2024 were not signed off on for review.
Root Cause	At this point in time our former warehouse managers was resigning on 8/31/24 and our new warehouse manager was starting, leading to a misconnection in these document reviews.
Corrective Action	It was verified that all forms after 9/1/24 had been signed off on and reviewed properly. And Warehouse manager was addressed on the matter.
Verification of Closeout	Training was conducted and proof attached.
Completion Date	18/Sep/2024
Closeout Date	04/Oct/2024
	Evidence
Clause	2.4.5.2 Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.
Response	Minor
Evidence	During the audit, a quarantine or hold log was not provided for non-conforming products placed on hold or a quarantine status.
Root Cause	Our past practice of pulling the non-conforming product out of inventory and red wrapping to identified as bad, had sufficed for prior years and never flagged. We see that our former practice was deficient in compliance with the standard.
Corrective Action	- Create a non-conforming product tag - Put a Non-Conforming Tag on every red wrapped NC pallet on site.
Verification of Closeout	A hold tag and log sheet were created, training conducted, and proof attached.
Completion Date	24/Sep/2024

Closeout Date	04/Oct/2024
	Evidence
Clause	9.1.2.4 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 9.2.5). 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	Minor
Evidence	During inspection of the hot room, a sign posted to the wall with duct tape was coming loose causing an area that can not be easily cleaned. The QA Manager addressed the issue.
Root Cause	Use if improper adhesion method (duct tape) Tape use in production areas, were not addressed in our GMP Policy
Corrective Action	Remove old sign and clean wall of old adhesive Complete a tape audit in production areas Remove all taped signs and replace with laminated sign using magnetic clips
Verification of Closeout	The sign was hung up with magnetic clips, audit revised, training conducted, and proof attached.
Completion Date	20/Sep/2024
Closeout Date	04/Oct/2024

Audit Statements

	Item	Evidence
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)	John Williams, QA Manager; Jason Hurleman, President; Ted Kuhn, CFO; Ryan Wolser, Warehouse Manager; Chris Olszewski, Director of Warehouse and Distribution; Deb Adams, HR Coordinator; Chris Mastropasaqla: Production Manager; Shelly Hoppe: Auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details	This was an announced SQF Edition 9.0 Food Safety Re-certification Audit conducted at Adelphia Seafood located in West, Lawn (Reading), PA. Adelphia Seafood is located in a residential/commercial business area. The company is a second-generation family business. The 22,000 sq. ft. The

		site receives in fresh or frozen fish and seafood and cuts, fillets, and/or packs to customer specifications and manufactures various RTE/RTC products (crab cakes, soups, and salads) containing seafood to wholesale and retail operations.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)	John Williams, QA Manager; Jason Hurleman, President; Ted Kuhn, CFO; Ryan Wolser, Warehouse Manager; Chris Olszewski, Director of Warehouse and Distribution; Deb Adams, HR Coordinator; Chris Mastropasaqla: Production Manager; Shelly Hoppe: Auditor
Auditor Recommendation	Auditor Recommendation	Issue of Certification of Registration recommended once deficiencies rectified

2.1.1 Management Responsibility Module 2 Food Manufacturing			
Element	**Description**	**Primary Response**	**Evidence**
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	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.	Compliant	
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.	Compliant	
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.	Compliant	
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	Compliant	

	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		
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 2.1.1 Management Responsibility Summary

The "Food Safety and Quality Policy Statement" has been prepared and signed by the senior site manager. It is prominently displayed in lunchroom and translated into multiple languages for effective communication to all site personnel. Food safety objectives and performance measures have been established, documented, and communicated. Records reviewed demonstrate the adoption of food safety practices and compliance with SQF System requirements. Training records and incident reports confirm employee awareness, accountability, and encouragement to report food safety issues. Documentation highlights initiatives empowering employees to address food safety concerns within their scope. The reporting structure identifies specific responsibilities and backup personnel within the food safety management system and is current. Job descriptions for key personnel have been documented. The QA Manager, the designated SQF Practitioner, a dedicated full-time employee equipped with comprehensive HACCP food safety training, as substantiated by a certificate from 360 Training, dated August 28, 2023. The SQF Practitioner is responsible for the formulation, execution, and maintenance of the SQF System. In contingency, the backup practitioner is the President, similarly well-versed in HACCP and possessing a profound understanding of SQF system prerequisites. The backup practitioner has HACCP training completed in April 5, 2023. The primary and substitute SQF practitioners oversee the SQF System's development, implementation, and maintenance. Essential information is communicated to senior management on a bi-weekly basis. Procedures for maintaining system integrity and continuity in the face of organizational or personnel changes are outlined. Designated blackout periods have been communicated to the certification body in advance, with documented justifications. These pieces of evidence and supporting documents collectively demonstrate the thorough and effective implementation of the specified requirements by senior site management, ensuring a strong commitment to food safety, a positive food safety culture, clear roles and responsibilities, and ongoing system integrity and compliance.

2.1.2 Management Review Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence

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.	Compliant	
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.	Compliant	

SS 2.1.2 Management Review Summary

The SQF System undergoes an annual review conducted by the site's HACCP Team, with the most recent evaluation having been meticulously documented and finalized on January 8, 2024. This comprehensive review includes a thorough assessment of the food safety manual, food safety objectives, as well as an examination of internal and external audit findings, corrective action investigations and resolutions, and customer complaints, including their respective investigations and resolutions. The site actively promotes a strong food safety culture, which involves the formulation and quantification of food safety objectives. This commitment extends to the comprehensive adoption of SQF system principles and practices, alongside the empowerment of employees to promptly report and address any food safety concerns that may arise. To assess the effectiveness of the food safety culture and objectives, the site relies on the insights provided in the Annual Management Review Meeting. The review process also extends to food safety plans, adherence to Good Manufacturing Practices, and all aspects of the SQF system whenever there are potential changes in key personnel, products, or processes. In this context, the SQF Practitioner consistently keeps senior site management informed monthly through monthly management reviews. This communication channel serves to keep the site and management updated on any developments that could potentially impact the site's SQF System. Detailed records of these meetings are maintained and were reviewed for the dates of July 11, 22024 and September 5, 2024, reaffirming commitment to transparency and accountability.

2.1.3 Complaint Management Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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	Compliant	

	maintained.		

SS 2.1.3 Complaint Management Summary

The site maintains a well-documented and implemented policy, as outlined in the Complaint Program policy. This policy serves as guiding framework, defining the procedures and delineating the responsibilities pertaining to the management of customer complaints, as well as the rigorous investigation and identification of root causes. A dedicated team, led by QA Manager, takes the lead in the comprehensive investigation of these complaints, ensuring that each case is thoroughly examined, and appropriate corrective actions are implemented. Detailed records are maintained for each complaint and its corresponding resolution. The site has a commitment to continuous improvement and transparency, a review of complaint records, encompassing open clams in the summer months, mis-picks, and delivery errors. This confirmed that investigations and corrective measures had been successfully executed in response to the complaints. Additionally, the site proactively monitors and analyze complaint trends using graphical representations, covering the time span from year over year from August 2023 to current.

2.2.1 Food Safety Management System Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	

SS 2.2.1 Food Safety Management System Summary

An extensive food safety manual, which details the methodologies and protocols for upholding the SQF Food Safety Code, has been thoughtfully crafted and is maintained, both in hard copy and electronic formats, under the title Food Safety Manual. Its most recent comprehensive review was conducted on January 1, 2024, with oversight provided by SQF Practitioner. Within the confines of this food safety manual lies a comprehensive compilation encompassing the certification's scope, an exhaustive product list falling under said scope, the

organizational hierarchy, and an array of food safety policies, programs, and procedures that collectively constitute the bedrock of the site's SQF System. To ensure accessibility, the manual is made readily available to all pertinent staff members, facilitated through requesting from the Food Safety Department.

2.2.2 Document Control Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	

SS 2.2.2 Document Control Summary

During the audit, it was observed that the site has effectively implemented its document control policy, denoted as Document Control policy. This policy accurately outlines the methods and responsibilities pertaining to document control within the organization. The audit revealed that records were readily accessible and properly stored in accordance with the established policy. Furthermore, the site maintains an up-to-date list of all SQF documents, ensuring that these documents are securely stored and easily accessible when needed. Notably, the register of SQF documents, referred to as SQF System Elements Register, was found to be located on the company shared drive. This approach to document control contributes to the site's commitment to maintaining the integrity and accessibility of its SQF documents.

2.2.3 Records Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
2.2.3.1	The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.	Compliant	
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.	Minor	During document review for the End of Day Checklist, the forms for August 31, 2024 and September 1, 2024 were not signed off on for review.
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.	Compliant	

SS 2.2.3 Records Summary

The site has implemented its policy for verifying and retaining records found in the document called Document Control policy. The facility has documented procedures for recording production as well as the proper correcting and initialing of errors. These are based on customer, company, and regulatory requirements. Documents are reviewed in a timely manner except for as noted below. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage, and have documented retention times. Records are

retained for three years in secure storage in QA office and the secured cage in the administration building. 2.2.3.2 Minor During document review for the End of Day Checklist, the forms for August 31, 2024 and September 1, 2024 were not signed off on for review.

2.3.1 Specification, Formulation and Realization Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 2.3.1 Specification, Formulation and Realization Summary

The policy defining the methods and responsibilities for commercialization of new products, called Product Formulation and Realization Policy has been implemented. Procedures conducted at the facility include checking formulations and processes with production trials, shelf-life trials and product testing. Shelf-life trials are conducted to establish "best by" dates, handling & storage requirements and microbiological criteria. The food safety plan is validated and verified for each new product and process by review. This review includes changes to distribution and ingredients. The facility maintains records of all steps of the product development cycle including process development, shelf-life trials and facility trials. The site has not

developed any new products in the most recent twelve months.

2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services) Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
2.3.2.1	The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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).	Compliant	
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.	Compliant	
2.3.2.7	Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.	Compliant	
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.	Compliant	

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.	Compliant	
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.	Compliant	

SS 2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services) Summary

Specifications for raw materials, packaging, ingredients, additives, chemicals and processing aids have been documented. Current registers were reviewed for raw materials, packaging materials and labels. Specifications for raw materials, packaging, and ingredients/additives were reviewed and found to be current. A policy defining the methods and responsibilities for developing and maintaining specifications has been documented and implemented in Specification Policy. Raw and packaging materials are verified to ensure product safety, regulatory requirements and fit for purpose requirements are met. These are done by means of testing of the materials, the receipt of Letters of Guarantee, Certificates of Compliance and/or Certificates of Analysis. Food contact packaging, clear salad tub, has a certificate of conformance from an approved packaging supplier, indicating that it does not present a risk of chemical migration to food products. Product labels are approved by QA Manager and President, who is qualified to ensure they are accurate and meet regulatory requirements. There is a register of raw material, ingredients, and packaging specifications, found to be maintained in Supplier Documentation Tracker that was current. Descriptions of services provided by all contract service providers having an impact on food safety are documented in the Contract Service Provider Register. A list of current contract service providers is maintained on the company shared drive and found to include providers of services including uniforms, roofing, pest control, and knife sharpening. Contract arrangements for waste removal and pest control were reviewed during the audit and found to be satisfactory. Finished product specifications are current, documented and approved by the site's customers. Specifications include microbiological and chemical limits, labeling and packaging requirements. A register of all current finished product specifications is maintained in the Finished Product Register. Finished product specifications for Backfin Crab Cakes, Lobster Salad, and She-Crab Soup were reviewed during the audit and contained the required information.

2.3.3 Contract Manufacturers Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Not Applicable	The site does not use contract manufacturers. N/A
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	Not Applicable	The site does not use contract manufacturers. N/A

	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.		
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.	Not Applicable	The site does not use contract manufacturers. N/A
2.3.3.4	Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.	Not Applicable	The site does not use contract manufacturers. N/A
SS 2.3.3 Contract Manufacturers Summary			
2.3.3.1 – 2.3.3.4 The site does not use contract manufacturers. N/A			

2.3.4 Approved Supplier Program Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	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.	Compliant	
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	Compliant	

	identified by the site.		
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 2.3.4 Approved Supplier Program Summary

The site has a written supplier approval policy Ingredient & Supplier Approval Responsibility Program, which has been implemented and covers the procedures for approving suppliers of raw materials, ingredients, packaging materials and services. The policy includes a review of the specifications of products, the supplier's food safety controls, procedures for granting and monitoring approved suppliers, the level of risk of products to the site and details of requirements for Certificate of Conformance, Certificates of Analysis and testing. Approved supplier performance and status is reviewed using complaints and performance. The procedures for emergency use of non-approved suppliers have been documented. A register is maintained of all current approved suppliers, which was reviewed during the audit and found to be acceptable. Raw materials: Tabasco sauce, crab meat, and Old Bay Crab Cake Mix, found in the storage warehouse were verified to have come from suppliers on the Approved Supplier List. Supplier audits are based on risk.

2.4.1 Food Legislation Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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	Compliant	

	by email to foodsafetycrisis@sqfi.com.		

SS 2.4.1 Food Legislation Summary

The site has ensured that products delivered to its customers comply with regulatory requirements in the country of use by conducting a Pre-Shipment Review of documentation for the finished product. Regulatory compliance for this operation includes food safety requirements, allergen content, additives, labeling, and nutritional labeling. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of a member of trade association, web sites, FSIS, Pennsylvania Department of Agriculture, and USDA. The site has a written provision that NSF, the certification body, and SQFI will be notified in writing within 24 hours if a regulatory warning or event requiring public notification occurs.

2.4.2 Good Manufacturing Practices Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	

SS 2.4.2 Good Manufacturing Practices Summary

The property, buildings and equipment are located, constructed, and designed to ensure food is manufactured in a safe, hygienic environment. The food safety pre-requisite programs are found in HACCP plan. The effectiveness of the pre-requisite programs has been verified based on a schedule, which is found in the Food Safety Manual. The site has conducted a food safety risk analysis to ensure product safety is not compromised. The site has written and implemented Good Manufacturing Practices applicable to the scope of this certification.

2.4.3 Food Safety Plan Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	

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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
2.4.3.10	Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety	Compliant	

	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.		
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).	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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).	Compliant	
2.4.3.16	Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.	Compliant	
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.	Compliant	
SS 2.4.3 Food Safety Plan Summary			

Three Food Safety Plans [1. Seafood Processing (fish cutting), 2. Kitchen (processing salads, dips, pizzas, soups, etc), and 3. Fresh Shellfish] have been developed, implemented and maintained by the site. They are kept on file in the HACCP binders and on the company shared drive and maintained by the QA Manager. The Food Safety Plans have been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained, with documentation found on the company shared drive. The plans 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 process flow has been verified by the site per observation on the floor. 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. Critical Control Points and limits have been identified per plan for receiving temperatures, storage temperatures, label verification and review, metal checks, and shipping temperatures. The RTE and RTC products also have cooking and cooling temperatures monitoring. The site utilizes Appendix A and B for the temperature guidelines. The Critical Limits for the CCPs have been developed, for receiving temperature of 45°F, storage temperature of 45°F for shell stock and shucked products and 35°F for fresh fish, label verification for Histamine and allergens, shipping temperature of 45°F, and visual metal checks include daily inspections of knives and skinners. The RTE/RTC products/processes include CCPS pertaining to thawing, cooling according to Appendix B, and cooking to Appendix A. These are monitored 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 dates for the Seafood Processing on February 21,2024, Kitchen on March 29, 2024, and the Fresh Shellfish on April 8, 2024.

2.4.4 Product Sampling, Inspection and Analysis Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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).	Not Applicable	The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety. N/A
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.	Not Applicable	The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product

	Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.		safety. N/A
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.	Not Applicable	The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety. N/A
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 shelflife of the product.	Compliant	
2.4.4.6	Records of all inspections and analyses shall be maintained.	Compliant	

SS 2.4.4 Product Sampling, Inspection and Analysis Summary

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 Product Sampling and Inspections. Certificates of Analysis are required for ingredients, raw materials, and packaging. All analyses are conducted to nationally recognized standards or by an equivalent validated method. The site utilizes an offsite laboratory for environmental testing, and it is ISO 17025 certified with a certificate number of 3329.03. Product evaluation and testing records were reviewed for APC and Coliforms during the audit and found to be conducted per procedures. If mandated by customers or regulatory standards, retention samples are stored in accordance with the typical storage conditions specified for the product. These storage conditions should align with the recommended parameters to maintain the integrity and quality of the product over its designated shelf life. 2.4.4.2 – 2.4.4.4 The facility does not have an on-site chemical or microbiological laboratory that may pose a risk to product safety. N/A

2.4.5 Non-conforming Materials and Product Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
2.4.5.2	Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.	Minor	During the audit, a quarantine or hold log was not provided for non-conforming products placed on hold or a quarantine status.

SS 2.4.5 Non-conforming Materials and Product Summary

The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment in document Non-Conforming Product Policy, which were found to be properly implemented in the facility. Methods to segregate, identify, handle and dispose of product include segregation and physically placing on hold with red wrap and tags, and were observed to minimize any inadvertent use. Nonconforming products or equipment is identified, segregated or disposed of, with records maintained by QA Manager. Relevant staff is aware of the site's Hold policy, as evidenced by interviews with processing employees. 2.4.5.2 Minor During the audit, a quarantine or hold log was not provided for non-conforming products placed on hold or a quarantine status.

2.4.6 Product Rework Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Not Applicable	Product is not reworked, recouped or recycled. N/A

SS 2.4.6 Product Rework Summary

2.4.6.1 Product is not reworked, recouped or recycled. N/A

2.4.7 Product Release Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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	Compliant	

	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.		
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.	Compliant	

SS 2.4.7 Product Release Summary

The site has written procedures Product Release SOP, implemented for releasing finished products. 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 and quality controls have been met. A review of records for pre-shipment review for finished products released during the audit showed they had been conducted per procedures.

2.4.8 Environmental Monitoring Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 2.4.8 Environmental Monitoring Summary

The facility has established a robust risk-based environmental monitoring program outlined in the document titled Environmental Monitoring Program. This comprehensive initiative involves weekly swabbing/sponging activities for Listeria conducted in approximately two areas randomly in zones 1 through 3. The thoroughness of this program is evidenced by the records and trends reviewed, which indicate that corrective actions were promptly implemented in response to any identified unsatisfactory trends. This proactive and systematic approach underscores the site's commitment to maintaining a high standard of environmental hygiene, ensuring the ongoing integrity and safety of its operations.

2.5.1 Validation and Effectiveness Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	

SS 2.5.1 Validation and Effectiveness Summary

The methods, responsibilities and criteria for ensuring the effectiveness of Good Manufacturing Practices, critical food safety limits and all other applicable elements of the SQF System have been documented and implemented. These methods are in various parts of the SQF system and were found to ensure that each has been implemented effectively. Methods to ensure that procedure or process changes are still effective in controlling food safety are in place and documented in the Validation and Effectiveness Program. Critical food safety limits are re-validated at least annually by review. Records of all verifications of effectiveness and validations are maintained by the QA Manager.

2.5.2 Verification Activities Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	

SS 2.5.2 Verification Activities Summary

The site has established a verification schedule, dated November 10, 2022, outlining the verification steps, procedures and responsibilities for each verification activity. The schedule is found in QA Verification Schedule and maintained by the QA Manager. The procedures for verifying Good Manufacturing Practices, critical control points, other food safety controls and regulatory compliance include utilizing authorized personnel to verify all monitoring activities. Records of verification of monitoring activities including water testing and thermometer calibrations were reviewed.

2.5.3 Corrective and Preventative Action Module 2 Food Manufacturing			
Element	**Description**	**Primary Response**	**Evidence**
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.	Compliant	
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.	Compliant	
SS 2.5.3 Corrective and Preventative Action Summary			
The site's Corrective and Preventative Action program is written in Corrective and Preventative Actions Policy. It describes the methods and responsibilities for investigating, resolving and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Records of investigations and corrective actions were reviewed for GMP audits, customer complaints, and sanitation issues. These were found to have reviews, investigations, corrective and preventative actions and resolutions documented.			

2.5.4 Internal Audits and Inspections Module 2 Food Manufacturing			
Element	**Description**	**Primary Response**	**Evidence**
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.	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.	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.	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).	Compliant	

SS 2.5.4 Internal Audits and Inspections Summary

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document Internal Audits Program. The Internal Audit Program is maintained by QA Manager. Facility and equipment inspections are conducted regularly to ensure Good Manufacturing Practices are followed, which is documented in GMP Inspections and Band Aid Logs. All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. The frequency of the audits is communicated to management; QA Manager is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and where practical, audit areas independent of their function. Record of internal audits in the facility conducted on August 23, 2024 was sampled and reviewed during the audit.

2.6.1 Product Identification Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	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.	Compliant	

SS 2.6.1 Product Identification Summary
A policy defining how products are identified from receipt through production and shipping has been documented in Product Identification SOP. 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 receiver/warehouse department. Product identification records were reviewed during the audit for End of Day Checklist for Fish Cutting, receiving records, and shipping records and demonstrated the products were properly identified throughout the process. Product startup/changeover procedures during packing ensure that the correct product goes into the correct package with the correct label.

2.6.2 Product Trace Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	

SS 2.6.2 Product Trace Summary
A policy defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back). This is written in Traceability SOP. 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 maintained. N/A The site does not use rework.

2.6.3 Product Withdrawal and Recall Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
2.6.3.1	The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: 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.	Compliant	

	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.		
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 2.6.3 Product Withdrawal and Recall Summary

The site has a Recall Plan defining the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and is led by QA Manager. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities and other essential bodies. This includes SQFI and NSF, 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 semi-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 trace exercises performed for 3.5 oz unbreaded crab cakes on July 16, 2024 and tuna on June 19, 2024. The mock trace exercise records reviewed showed the Product Withdrawal and Recall procedures were tested back one step and forward one step with acceptable accountability. The auditor initiated a vertical mock exercise on halibut cut on July 10, 2024. The mock exercise was completed within an hour with 100% recovery.

2.6.4 Crisis Management Planning Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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	Compliant	

	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.		
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.	Compliant	

SS 2.6.4 Crisis Management Planning Summary
The site's written Crisis Management Plan is found in document Crisis Management Plan. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. QA Manager and/or President, have oversight of the Plan and a Crisis Management team has been identified and trained as evidenced by scenario training. The Plan includes responses to a business interruption, isolating and identifying affected products 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 June 12, 2024, involving a disaster scenario of fire in the kitchen area that affected the food safety of the site's products. Records are maintained on the company shared drive, including follow-up corrective actions of this review and annual test of the Crisis Management Plan.

2.7.1 Food Defense Plan Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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	Compliant	

	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.		
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).	Compliant	
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.	Compliant	
SS 2.7.1 Food Defense Plan Summary			
The site has a Food Defense Policy, in which the procedures, 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, QA Manager and President, 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. The Food Defense Plan was last tested and challenged on July 17, 2024, and August 24, 2024, with records reviewed.			

2.7.2 Food Fraud Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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).	Compliant	
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.	Compliant	
SS 2.7.2 Food Fraud Summary			

The facility has undertaken a thorough Food Fraud Vulnerability Assessment, meticulously evaluating the site's susceptibility to various fraudulent practices aimed at economic gain, such as product substitution, mislabeling, counterfeiting, and dilution, with a direct focus on potential impacts on food safety. Subsequently, a comprehensive Food Fraud Mitigation Plan has been developed to systematically address and control the identified vulnerabilities. The Vulnerability Assessment and the Mitigation Plan underwent a recent review on June 4, 2024. Documentation of these reviews is securely stored in the company's shared drive, highlighting the facility's commitment to transparency and diligence in managing food fraud risks.

2.8.1 Allergen Management Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	

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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	N/A The site does not rework product.
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.	Compliant	

SS 2.8.1 Allergen Management Summary

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document Allergen Control SOP and is the responsibility of QA Manager. Allergens of concern in this operation were observed to be all 9 allergens of wheat, soy, eggs, milk, peanuts, tree-nuts, fish, sesame, and crustaceans. A risk analysis was observed to be in place for allergens including raw materials, ingredients and processing aids such as food grade lubricants. Workplace allergens from locations such as lunch rooms, 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. The product trace system ensures the complete trace of allergen ingredients. The site has procedures in place, found in document Label Review Procedure, to control the accuracy of finished product labels, including labels of allergenic products. This was observed to be implemented on the plant floor in the kitchen area. Product changeovers where allergen cross contamination could occur use validated cleaning and 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. 2.8.1.10 N/A The site does not rework product.

2.9.1 Training Requirements Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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).	Compliant	
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.	Compliant	

SS 2.9.1 Training Requirements Summary

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of QA Manager. The effectiveness of the facility's training program was evidenced by interviews with plant employees on the processing floor.

2.9.2 Training Program Module 2 Food Manufacturing

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	

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.	Compliant	

SS 2.9.2 Training Program Summary
The site has implemented a training program, entitled Adelphia Seafood Training Program, which covers the necessary competencies for plant personnel. This program requires training to be conducted in but not limited to Personnel Safety, GMPs, HACCP, and GFSI standards to ensure regulatory, food safety, food quality and all other requirements of the SQF System are met. HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The last training occurred on August 13, 2024. The training language and materials are in English and Spanish, the languages used in the operation and understood by all plant personnel. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering but not limited to hand washing, illness, food safety, and GMPs and interviews with processing line employees, it was evident the proper refresher training has been conducted to ensure food safety, quality and the SQF system are maintained. Specific refresher training topics are covered on an annual or as needed. A training skills register is maintained by the QA Manager and during the review was found to have a listing of the trainee, trainer, the description of the training, the date of training and verification by supervision that the training was completed. The site verifies the effectiveness of training by quizzes. Plant employees interviewed on the production floor were found to have current training records on the register.

9.1.1 Premises Location, Construction, and Housing Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.1.1	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.	Compliant	
9.1.1.2	Pens, yards, and lairage shall be designed, located, constructed, and maintained to minimize stress, injury, or disease and have minimal impact on the surrounding area and natural resources. Fences, gates, and other surfaces in pens and yards shall be free from paints, dips, sanitizers, and other materials that are likely to cause contamination through ingestion, inhalation, or contact. They shall be designed so that liquid waste can drain away and be collected if required, and that aerial fecal contamination does not contaminate meat products.	Not Applicable	N/A The site does not use pens, yards, or lairage.
9.1.1.3	Laneways, races, entrances, exits, and loading/unloading ramps shall be: i. Designed to include consideration of the social behavior and movement of the species; ii. Designed and maintained to prevent potential injury points to the animals; iii. Free from sharp objects that may damage the animals; and iv. Free from chemicals other than those approved by the relevant authority for use on	Not Applicable	N/A The site does not use laneways, entrances, exits or loading/unloading ramps.

	livestock		

SS 9.1.1 Premises Location, Construction, and Housing Summary
During the audit, a thorough examination of the site's buildings, property, and surroundings revealed that they do not present any discernible food safety risks to their products. This positive observation reflects the site's commitment to maintaining a safe external environment. In addition, the site's possession of the required approvals from relevant authorities, including the Authority, Seafood of FDA, and the Department of Agriculture for the State of Pennsylvania, serves as a testament to their commitment to compliance with regulatory standards. These approvals underscore the site's dedication to upholding food safety and regulatory compliance throughout their ongoing operations. 9.1.1.2 N/A The site does not use pens, yards, or lairage. 9.1.1.3 N/A The site does not use laneways, entrances, exits or loading/unloading ramps.

9.1.2 Building Materials Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.2.1	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.	Compliant	
9.1.2.2	Drains shall be constructed and located so they can be easily cleaned and not present a hazard.	Compliant	
9.1.2.3	Waste trap system shall be located away from any food handling areas or entrances to the premises.	Not Applicable	There are no waste traps on site. N/A
9.1.2.4	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 9.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.	Minor	During inspection of the hot room, a sign posted to the wall with duct tape was coming loose causing an area that can not be easily cleaned. The QA Manager addressed the issue.
9.1.2.5	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.	Compliant	
9.1.2.6	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	Not Applicable	There are no pipes carrying sanitary waste or wastewater that are located directly over product lines or storage area. N/A

	contamination risks are mitigated.		
9.1.2.7	Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meet 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.	Compliant	
9.1.2.8	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.	Not Applicable	There are no drop ceilings in the food manufacturing areas. N/A
9.1.2.9	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 9.2.5).	Not Applicable	There are no stairs, catwalks or platforms in processing areas. N/A

SS 9.1.2 Building Materials Summary

Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage of overflow or waste water. Waste water during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings and doors are of durable construction with smooth and light colored surfaces except as noted below. These areas were observed to be clean during the audit inspection. 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. Overhead cleaning was found to be part of the master cleaning schedule. 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 insulated panels, which are easily cleaned and prevent product contamination. 9.1.2.3 There are no waste traps on site. N/A 9.1.2.4 Minor During inspection of the hot room, a sign posted to the wall with duct tape was coming loose causing an area that can not be easily cleaned. The QA Manager addressed the issue. 9.1.2.6 There are no pipes carrying sanitary waste or wastewater that are located directly over product lines or storage area. N/A 9.1.2.8 There are no drop ceilings in the food manufacturing areas. N/A 9.1.2.9 There are no stairs, catwalks or platforms in processing areas. N/A

9.1.3 Lightings and Light Fittings Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.3.1	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.	Compliant	
9.1.3.2	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	Compliant	

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

SS 9.1.3 Lightings and Light Fittings Summary

During processing inspections, lighting was of the appropriate intensity for employees to carry out their tasks efficiently and complies with local and industry requirements. Lighting in the processing and warehouse areas are either covered or are shatter-proof. The QA Manager conducts LUX illumination light level tests on a monthly basis.

9.1.4 Inspection / Quality Control Area Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.4.1	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.	Compliant	

SS 9.1.4 Inspection / Quality Control Area Summary

Suitable area 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.

9.1.5 Dust, Insect, and Pest Proofing Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.5.1	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.	Compliant	
9.1.5.2	External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to	Compliant	

	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.		
9.1.5.3	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.	Compliant	

SS 9.1.5 Dust, Insect, and Pest Proofing Summary

External windows, doors and other openings were observed during facility inspection to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were 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.

9.1.6 Ventilation Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.6.1	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.	Compliant	
9.1.6.2	All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 9.2.5 to prevent unsanitary conditions.	Compliant	
9.1.6.3	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).	Compliant	
9.1.6.4	Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and be kept clean.	Compliant	

SS 9.1.6 Ventilation Summary

Adequate ventilation was available, where needed, in enclosed processing and food areas. Ventilation equipment was seen to be adequately cleaned, insect-proofed and located to not pose a risk of contamination. Ventilation and heat extraction were observed to be adequate above the kettle in the hot room and other heat-generating operations so that no condensation was noted.

9.1.7 Equipment and Utensils Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.7.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.	Compliant	
9.1.7.2	Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and so as not to pose a contamination threat to products.	Compliant	
9.1.7.3	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.	Compliant	
9.1.7.4	Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging material storage, and cold storage areas shall be constructed of materials that will not contribute a food safety risk.	Compliant	
9.1.7.5	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.	Compliant	
9.1.7.6	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 (refer to 9.2.5.1). Bins used for inedible material shall be clearly identified.	Compliant	
9.1.7.7	All equipment and utensils shall be cleaned after use (refer to 9.2.5.1) 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.	Compliant	
9.1.7.8	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.	Compliant	
9.1.7.9	Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal 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.	Compliant	
SS 9.1.7 Equipment and Utensils Summary			
Specifications for the site's equipment, utensils and protective clothing, and equipment purchasing procedures for equipment are documented in Purchasing New Equipment, Utensils and Protecting Clothing SOP and were seen to be appropriately implemented. Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable			

materials including stainless steel and food grade plastic. These items were found to be cleaned and stored properly after use to prevent cross contamination. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. Equipment and utensils, including tables, graders, skinners, tubs, bins and containers are designed, constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. Containers and bins are made of non-toxic materials and were labeled or color-coded, for appropriate use with either edible or non-edible materials. Vehicles used in food contact, handling, processing zones, and/or cold storage rooms are designed and operated to present a food safety hazard. Non-conforming/out of service equipment was tagged and or segregated to prevent inadvertent use.

9.1.8 Grounds and Roadways Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.1.8.1	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.	Compliant	
9.1.8.2	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.	Compliant	
9.1.8.3	Paths from amenities leading to site entrances shall be effectively sealed.	Compliant	

SS 9.1.8 Grounds and Roadways Summary

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 ponding of water was observed. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

9.2.1 Repairs and Maintenance Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.2.1.1	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.	Compliant	
9.2.1.2	Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control	Compliant	

	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.		
9.2.1.3	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.	Compliant	
9.2.1.4	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.	Compliant	
9.2.1.5	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.	Compliant	
9.2.1.6	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.	Compliant	
9.2.1.7	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.	Compliant	
9.2.1.8	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.	Compliant	

SS 9.2.1 Repairs and Maintenance Summary

The design, construction, and installation of equipment and utensils within this facility have been carefully implemented to not only meet regulatory requirements but also to proactively mitigate the risks associated with product contamination. During the audit, it was observed that the facility consistently adheres to the requirements related to the cleaning and proper storage of equipment and utensils after use, demonstrating a commitment to preventing cross-contamination. The establishment maintains a comprehensive set of Good Manufacturing Practices (GMP) procedures, which define responsibilities for the maintenance and repair of all plant equipment and buildings. These procedures include a well-documented schedule of planned preventive maintenance, with completed tasks recorded and securely stored in the maintenance office and on the electronic maintenance system. Personnel at the facility are well-versed in both GMPs and food safety protocols. Maintenance personnel remove all tools and debris after completing their tasks and promptly notify a supervisor. Before resuming operations, the facility performs appropriate cleaning and pre-operational inspections to ensure that all equipment and areas are in a safe and sanitary condition. Pre-operational inspections are conducted to identify and rectify potential sources of contamination, with a specific focus on loose parts and materials that could pose risks. Documentation was reviewed for July 8-12, 2024 and found acceptable. Temporary repairs are addressed within the facility's comprehensive cleaning program, complete with a clearly defined plan for their subsequent removal. Machinery, conveyors, and other equipment located above or near food or food contact surfaces are exclusively lubricated with food-grade materials, and the facility maintains a policy against the use of paint on any food contact surfaces.

9.2.2 Maintenance Staff and Contractors Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.2.2.1	Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 9.3).	Compliant	
9.2.2.2	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.	Compliant	
9.2.2.3	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 restarting site operations.	Compliant	

SS 9.2.2 Maintenance Staff and Contractors Summary

Maintenance personnel and contractors are trained in good manufacturing practices and food safety. Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures by means of GMP training and/or 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.

9.2.3 Calibration Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.2.3.1	The methods and responsibility for calibration and re-calibration of measuring, test, 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.	Compliant	
9.2.3.2	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.	Compliant	
9.2.3.3	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.	Compliant	
9.2.3.4	Procedures shall be documented and implemented to address the resolution of potentially affected products, when measuring, test, or inspection equipment is found to be out of calibration.	Compliant	

9.2.3.5	Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.	Compliant	
9.2.3.6	A directory of measuring, test, and inspection equipment that requires calibration and records of the calibration tests shall be maintained.	Compliant	

SS 9.2.3 Calibration Summary

A comprehensive policy outlines the precise methods and responsibilities governing the calibration of measuring, testing, and inspection equipment, and this policy has been effectively put into practice. In cases where software is employed for these purposes, it is duly validated to ensure accuracy and reliability. To ensure the systematic upkeep of all equipment, a detailed calibration schedule was created, with corresponding documentation housed in the Calibration SOP. The frequency of calibration is determined by adhering to manufacturer recommendations or specific customer requirements. A review of calibration records, including scales and thermometers, substantiates adherence to this schedule. Furthermore, the policy encompasses clear procedures for handling any product affected should inspection equipment be identified as out of calibration, as outlined in the Calibration SOP. The site takes proactive measures to safeguard inspection and testing equipment, promptly placing any equipment that is either damaged or subject to unauthorized use out of service and on hold. All equipment is calibrated against established national or international standards, ensuring precision and accuracy. An up-to-date directory of calibration equipment was reviewed, affirming the site's dedication to maintaining a robust calibration system.

9.2.4 Pest Prevention Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.2.4.1	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.	Compliant	
9.2.4.2	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	Compliant	

	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.		
9.2.4.3	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.	Compliant	
9.2.4.4	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.	Compliant	
9.2.4.5	Pesticides shall be clearly labeled and stored (refer to 9.6.5) if kept on-site	Not Applicable	N/A The site does not store pesticides.
9.2.4.6	No animals shall be permitted on-site in food handling and storage areas.	Compliant	

SS 9.2.4 Pest Prevention Summary

A comprehensive policy lays out the site's program for pest prevention and outlines the necessary protocols for addressing any potential pest-related issues. This policy was implemented and put into practice, resulting in premises that were maintained, free of waste and debris, as confirmed during both interior and exterior inspections. Notably, no signs of pest activity were detected during these inspections, mitigating any risk of product contamination. However, the site maintains a well-defined corrective action procedure and rigorous record-keeping protocols should such an occurrence ever arise. The site has engaged the services of a reputable Pest Contractor, as evidenced by an updated scope of service dated July 23, 2024. This document outlines the methods for pest prevention, the frequency of interior and exterior inspections, and specifies the pests targeted in the program. In addition, a current and accurate site map dated July 11, 2024 provides clear and detailed information on the placement of 3 ILTs (Insect Light Traps), 16 external, and 21 internal devices, further enhancing the site's pest prevention capabilities. The site maintains a pesticide application log, offering a comprehensive record of all chemical usage, complete with detailed information and dates. Furthermore, the licenses of the Pest Contractor, valid until December 31, 2024, have been duly obtained from local authorities, affirming the competence and training of their employees. A comprehensive list of chemicals used by the Pest Contractor is housed in the PCO (Pest Control Operator) binder, accompanied by relevant SDS (Safety Data Sheet) information. To ensure ongoing effectiveness, inspection activity reports, signed by a management representative after each visit, are consistently completed as scheduled. Any observations or issues identified by the Pest Contractor are promptly addressed and meticulously documented by the site. The site maintains a system for tracking and trending pest activity frequencies, which is documented in the Pest Trending, further underscoring their commitment to maintaining a pest-free environment. Animals are not permitted in the processing areas. 9.2.4.5 N/A The site does not store pesticides.

9.2.5 Cleaning and Sanitation Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.2.5.1	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.	Compliant	
9.2.5.2	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 that detergents and sanitizers are stored as outlined in element 9.6.5 and are handled only by trained staff.	Compliant	
9.2.5.3	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.	Compliant	
9.2.5.4	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.	Not Applicable	Clean-In-Place procedures are not carried out at the site. N/A
9.2.5.5	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.	Compliant	
9.2.5.6	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.	Compliant	
9.2.5.7	Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces,	Compliant	

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

SS 9.2.5 Cleaning and Sanitation Summary

The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms, and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan for June 2024 to September 5, 2024 showed cleaning tasks were completed as scheduled. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a food product contamination. Sanitation tasks and pre-operational inspections by qualified personnel are documented. A verification schedule includes the methods, frequencies, and responsibilities for verifying the effectiveness of cleaning methods. Pre-operational inspections for June 8, 2024 to September 5, 2024 were reviewed and had proper corrective actions documented as required. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Chemicals Ecolab Solid Drain Sanitizer Puck and Uni-Kem Meat Room Cleaner were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Dispensed cleaning chemicals were properly stored and identified. Cleaning chemicals mixed on-site have concentration checks conducted by room leads and recorded in Daily Sanitizer PPM Log. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted December 5, 2023. 9.2.5.4 Clean-In-Place procedures are not carried out at the site. N/A

9.3.1 Personnel Welfare Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.3.1.1	Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packaging or storage processes shall not engage in the processing or packaging of food or enter storage areas where food is exposed.	Compliant	
9.3.1.2	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.	Compliant	

9.3.1.3	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.	Compliant	

SS 9.3.1 Personnel Welfare Summary

The site has a medical screening process for employees, visitors, and contractors prior to entering the facility. The process is self-screening due to HIPA laws and confidentiality regulations. The site has implemented a medical screening process for employees, visitors, and contractors. The process included answering questions on medical issues and should report any illness that may affect food safety. A Good Manufacturing Practice policy for all employees has been documented and implemented. 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 site has a medical screening process and training program to ensure employees are aware of the risks of contamination of food. The policy 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.

9.3.2 Handwashing Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.3.2.1	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.	Compliant	
9.3.2.2	Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.	Compliant	
9.3.2.3	Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and as 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.	Compliant	
9.3.2.4	The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.	Compliant	
9.3.2.5	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.	Compliant	

9.3.2.6	When gloves are used, personnel shall maintain the handwashing practices outlined above.	Compliant	

SS 9.3.2 Handwashing Summary
A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands-free operated taps and hand sanitizers are available in areas of the facility. 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 employees in the kitchen and fish cutting areas 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.

9.3.3 Clothing and Personal Effects Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.3.3.1	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.	Compliant	
9.3.3.2	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.	Compliant	
9.3.3.3	Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.	Compliant	
9.3.3.4	Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.	Compliant	
9.3.3.5	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.	Compliant	
9.3.3.6	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.	Not Applicable	Protective clothing is not required at the facility. N/A
9.3.3.7	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	Compliant	

9.3.3.8	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.	Compliant	

SS 9.3.3 Clothing and Personal Effects Summary

A policy, based on a documented risk assessment, found in GMP Policy and Procedures, 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 are to be changed when soiled or damaged. Employees were observed to comply with the clothing requirements of the facility. Non-disposable gloves and aprons were observed to be cleaned and properly stored per site policies. Protective clothing meets documented specifications, is easily cleaned, and is made of material that will not contaminate food. Employees store protective clothing on racks adjacent to access points when going on breaks. Protective clothing are cleaned at appropriate frequencies and are properly stored to prevent contamination. 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 inspection. Blue band aids are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management. 9.3.3.6 Protective clothing is not required at the facility. N/A

9.3.4 Visitors Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.3.4.1	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.	Compliant	
9.3.4.2	All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 9.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.	Compliant	
9.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.	Compliant	
9.3.4.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.	Compliant	

SS 9.3.4 Visitors Summary

A policy defining visitor and contractor requirements found in Visitor Policy has been documented and implemented. The policy requires that 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.

9.3.5 Staff Amenities (change rooms, toilets, break rooms) Module 9 GMP for Processing of Animal Products			
Element	**Description**	**Primary Response**	**Evidence**
9.3.5.1	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.	Compliant	
9.3.5.2	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.	Compliant	
9.3.5.3	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.	Compliant	
9.3.5.4	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.	Compliant	
9.3.5.5	Where required, a sufficient number of showers shall be provided for use by staff.	Not Applicable	Showers are not required at this facility. N/A
9.3.5.6	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.	Compliant	
9.3.5.7	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.	Compliant	
9.3.5.8	Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 9.3.2.3.	Compliant	
9.3.5.9	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	Compliant	

	free from waste materials and pests.		
9.3.5.10	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.	Compliant	

SS 9.3.5 Staff Amenities (change rooms, toilets, break rooms) Summary

Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are facilities/locker rooms 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. 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 production 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. Lunch rooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunch rooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. 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 lunch rooms and entrance to the processing area. Lunch rooms were observed to be clean and well-maintained during the audit inspection. 9.3.5.5 Showers are not required at this facility. N/A

9.4.1 Staff Engaged in Food Handling and Processing Operations Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.4.1.1	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 material, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. 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.	Compliant	
9.4.1.2	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 9.4.1.4; 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	Compliant	

	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.		
9.4.1.3	The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.	Compliant	
9.4.1.4	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.	Not Applicable	Sensory evaluations are not conducted in the food handling/processing areas. N/A

SS 9.4.1 Staff Engaged in Food Handling and Processing Operations Summary

Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. Ingredients were in appropriate, labeled containers and kept off the floor. Wash down hoses were observed to be properly stored on racks when not in use. The process flow was observed to be logical, with a continuous flow and designed to prevent cross contamination. It was observed during audit inspection that the flow of employees is such that any cross contamination is minimal. The GMP policy prohibits smoking, eating, drinking or spitting in the facility. Smoking is permitted only in designated areas. 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. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. 9.4.1.4 Sensory evaluations are not conducted in the food handling/processing areas. N/A

9.4.2 Animal Husbandry Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.4.2.1	Ante-mortem inspections by a qualified person shall be carried out to ensure animals are free from disease and fit for human consumption.	Not Applicable	The site does not conduct animal husbandry. N/A
9.4.2.2	Animals that are subject to the control of prohibited substances such as veterinary medicine, heavy metals, or pesticides shall be identified and procedures implemented for their segregation and processing.	Not Applicable	The site does not conduct animal husbandry. N/A
9.4.2.3	Animals for slaughter shall have clean water at all times, and clean feed, if held	Not	The site does not conduct animal husbandry. N/A

	in lairage for extended periods. e flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.	Applicable	
9.4.2.4	Employees responsible for the care and management of animals ante-mortem shall be trained and competent in animal handling and welfare. They shall be able to recognize the early signs of distress and disease and ensure pain and stress to animals is minimized.	Not Applicable	The site does not conduct animal husbandry. N/A
9.4.2.5	Animals deemed to be diseased or otherwise unfit for human consumption must be segregated from healthy animals and condemned or otherwise excluded from processing.	Not Applicable	The site does not conduct animal husbandry. N/A
9.4.2.6	The site shall implement measures to prevent cross-contamination of animals for slaughter from agricultural or cleaning chemicals, waste materials, or other materials that could contaminate the animals.	Not Applicable	The site does not conduct animal husbandry. N/A
SS 9.4.2 Animal Husbandry Summary			
9.4.2.1 – 9.4.2.6 The site does not conduct animal husbandry. N/A			

9.4.3 Slaughtering and Butchering Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.4.3.1	Only slaughtering methods that are humane and approved for use for a given species by national or international regulations shall be used.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.2	Where a two-stage process is used, the time interval between stunning and killing shall not exceed regulatory requirements. The use of direct air injection is not permitted.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.3	The site shall have a pathogen control program that addresses known biological hazards and demonstrates compliance to regulations and customer standards.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.4	Knives and tools used for skinning shall be cleaned and sterilized between each carcass. Knives and tools that become contaminated shall be cleaned and sterilized prior to use on edible tissue.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.5	Procedures shall be documented and implemented to maintain the hygienic condition of the carcass and avoid contamination. Fecal matter shall be removed at the slaughter floor and the carcass shall be inspected by an authorized person postmortem for signs of disease or contamination. Where applicable,	Not Applicable	The site does not conduct slaughtering and butchering. N/A

	procedures shall be in place for the grading of carcasses.		
9.4.3.6	Cooling processes shall have defined time and temperature requirements and be regularly monitored and recorded.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.7	Procedures shall be in place for the safe and hygienic evisceration and primal cutting of the carcass and the identification of edible and non-edible parts. Edible parts of the carcass shall be processed and stored using clean, sanitized tools and containers and protected from contamination. They shall be covered when not in process.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.8	All edible parts of the carcass shall be identified through the post-mortem inspection process and traceable back to the animal and date and time of slaughter.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
9.4.3.9	Slaughter and butchering hygiene shall be regularly monitored for, at minimum, fecal pathogens. Risk-based species-specific microbiological analysis may also be in place.	Not Applicable	The site does not conduct slaughtering and butchering. N/A
SS 9.4.3 Slaughtering and Butchering Summary			
9.4.3.1 – 9.4.3.9 The site does not conduct slaughtering and butchering. N/A			

9.5.1 Water Supply Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.5.1.1	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.	Compliant	
9.5.1.2	Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.	Compliant	
9.5.1.3	Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.	Compliant	
9.5.1.4	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.	Compliant	
9.5.1.5	The use of non-potable water shall be controlled such that: i. There is no cross-	Not	Non-potable water is not used at this site. N/A

	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.	Applicable	
9.5.1.6	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.	Not Applicable	Water is not stored on site. N/A

SS 9.5.1 Water Supply Summary

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from PA American Water. The site has developed a contingency plan for the potable water supply when it is deemed unusable for processing. The contingency plan is located in the Crisis Management SOP. It was determined that there was adequate hot and cold water for cleaning and processing. Back flow devices are installed on water lines. Back flow devices are tested annually, and the last test was conducted on July 3, 2024. Hose stations, taps and other water sources are designed to prevent back flow or back siphonage. 9.5.1.5 Non-potable water is not used at this site. N/A 9.5.1.6 Water is not stored on site. N/A

9.5.2 Water Treatment Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.5.2.1	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.	Not Applicable	Water is not required to be treated at the facility. N/A
9.5.2.2	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 9.5.2.1).	Compliant	
9.5.2.3	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.	Not Applicable	Water is not required to be treated at the facility. N/A

SS 9.5.2 Water Treatment Summary

Water used as an ingredient or in cleaning or sanitizing equipment has been tested to ensure that water potability is maintained. Section 9.5.3 covers the site's potability testing. 9.5.2.1 - 9.5.2.3 Water is not required to be treated at the facility. N/A

9.5.3 Water Quality Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.5.3.1	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, which will come into contact with food or be used to heat water that will come into contact with food.	Compliant	
9.5.3.2	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.	Compliant	
9.5.3.3	Water and ice shall be analyzed using reference standards and methods.	Compliant	
SS 9.5.3 Water Quality Summary			
Water used in processing, thawing, treating or conveying of food, cleaning or handwashing is monitored periodically for potability by the site. The manufacture of ice with the potable water complies with potable water microbiological and quality standards. 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 of monthly. The last potability test was conducted on July 8, 2024.			

9.5.4 Ice Supply Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.5.4.1	Ice provided for use during processing operations, as a processing aid or an ingredient, shall comply with 9.5.3.1.	Compliant	
9.5.4.2	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.	Compliant	
9.5.4.3	Ice rooms and receptacles shall be constructed of materials as outlined in element 9.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.	Compliant	
SS 9.5.4 Ice Supply Summary			

Ice used in manufacturing is from a potable water source and is ozonated. Ice manufacturing equipment and storage receptacles are manufactured from materials that minimize the potential for contamination. Ice is periodically evaluated for foreign material. The site tests the ice on a monthly basis with the test results from August 12, 2024 reviewed.

9.5.5 Air and Other Gasses Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.5.5.1	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.	Not Applicable	N/A - Compressed air or other gases are not utilized in contact with food or food contact surfaces at this site.
9.5.5.2	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.	Not Applicable	N/A - Compressed air or other gases are not utilized in contact with food or food contact surfaces at this site.

SS 9.5.5 Air and Other Gasses Summary

9.5.5.1-9.5.5.2 N/A - Compressed air or other gases are not utilized in contact with food or food contact surfaces at this site.

9.6.1 Animal Transport Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.6.1.1	Vehicles used for transport of animals for slaughter shall be fit for purpose and clean before use. Vehicles shall be inspected and a record kept of the inspection.	Not Applicable	The site does not transport animals. N/A
9.6.1.2	Transport times for animals for slaughter shall be kept to a minimum and times recorded.	Not Applicable	The site does not transport animals. N/A
9.6.1.3	Where animals are held for extended periods in pens and yards, adequate supplies of water and fodder shall be provided.	Not Applicable	The site does not transport animals. N/A

SS 9.6.1 Animal Transport Summary

9.6.1.1 – 9.6.1.3 The site does not transport animals. N/A

9.6.2 Receipt, Storage, and Handling of Goods Module 9 GMP for Processing of Animal Products			
Element	**Description**	**Primary Response**	**Evidence**
9.6.2.1	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.	Compliant	
9.6.2.2	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.	Compliant	
9.6.2.3	The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.	Compliant	
9.6.2.4	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.	Compliant	
9.6.2.5	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.	Not Applicable	Temporary or overflow conditions are not used by the site. N/A
9.6.2.6	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.	Compliant	
SS 9.6.2 Receipt, Storage, and Handling of Goods Summary			
The site has implemented effective documented storage plan for the storage of raw materials, ingredients, packaging, equipment, and chemicals. For example, the Inventory End of Day work instruction SOP, was reviewed during the audit and found to be acceptable. Stock rotation, based on FIFO has been implemented by the site to ensure that all materials are used within their designated shelf-life. 9.6.2.5 Temporary or overflow conditions are not used by the site. N/A			

9.6.3 Cold Storage, Freezing, and Chilling of Foods Module 9 GMP for Processing of Animal Products			
Element	**Description**	**Primary Response**	**Evidence**
9.6.3.1	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	Compliant	

	cleaning.		
9.6.3.2	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.	Compliant	
9.6.3.3	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.	Compliant	
9.6.3.4	Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.	Compliant	

SS 9.6.3 Cold Storage, Freezing, and Chilling of Foods Summary

Chillers, freezers and cold storage areas are designed and constructed to allow for hygienic and efficient refrigeration. There appeared to be sufficient capacity for the facilities requirements and sufficient space for periodic cleaning. The condensate lines were connected directly to the plant drainage system. Temperature monitoring devices are located at the warmest part of the refrigerators/freezers, and temperatures are periodically monitored and recorded. Temperature monitoring for freezer, dated, June 8-12, 2024 was reviewed and met required targets. Refrigeration equipment is maintained on the plant's preventive maintenance schedule, and an outside contractor maintains the refrigeration equipment.

9.6.4 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.6.4.1	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.	Compliant	
9.6.4.2	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.	Compliant	

SS 9.6.4 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods Summary

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. Forklifts and other vehicles in processing areas and storage areas were observed to not present a food hazard.

9.6.5 Storage of Hazardous Chemicals and Toxic Substances Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.6.5.1	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 approved for use and stored on-site; and iii. Supported by current Safety Data Sheets (SDS) made available to all staff.	Compliant	
9.6.5.2	Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that 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.	Not Applicable	N/A The site does not store pesticides on site.
9.6.5.3	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-inprogress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.	Compliant	
9.6.5.4	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.	Compliant	
9.6.5.5	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 with first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.	Compliant	
9.6.5.6	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	Compliant	

9.6.5.7	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	Compliant	

SS 9.6.5 Storage of Hazardous Chemicals and Toxic Substances Summary
Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. No processing utensils or packaging were stored next to chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility. SDS and the label declaration and/or documented approval for the chemical's intended use were reviewed for Ecolab Solid Drain Sanitizer Puck, Lactic Acid, and uni-Kem Meat Room Cleaner. 9.6.5.2 N/A The site does not store pesticides on site.

9.6.6 Loading, Transport, and Unloading Practices Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.6.6.1	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.	Compliant	
9.6.6.2	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 negatively impact the product.	Compliant	
9.6.6.3	Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.	Compliant	
9.6.6.4	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.	Compliant	
9.6.6.5	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.	Compliant	
9.6.6.6	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.	Compliant	
9.6.6.7	On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked	Compliant	

	and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.		
9.6.6.8	Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.	Compliant	
SS 9.6.6 Loading, Transport, and Unloading Practices Summary			
A policy defining the practices for loading, unloading and storage of food products has been documented and implemented in Unloading and Loading work instructions. It was observed during the audit inspection 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. Refrigerated trailer temperatures are monitored and documented before loading of product. This was observed to be recorded in Incoming Truck Inspection Log. Product temperatures are checked at regular intervals before loading and the refrigeration units are checked and maintained for proper operation. It is the responsibility of the carrier to maintain the required temperatures during transport to the final destination. Documentation was reviewed for July 8, 2024, July 10,2024 and September 11, 2024. It was observed during the audit inspection that loading practices do not expose products to detrimental conditions. Warehouse interviews with employees revealed that employees are aware of the proper procedures and follow them.			

9.7.1 High-Risk Processes Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.7.1.1	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.	Compliant	
9.7.1.2	Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.	Compliant	
9.7.1.3	Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.	Compliant	
9.7.1.4	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.	Compliant	
9.7.1.5	Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.	Compliant	
SS 9.7.1 High-Risk Processes Summary			

The process of manufacturing high risk foods takes place under controlled conditions in a protected/segregated area. Ambient air is tested at a minimum of annually to confirm it does not pose a risk to food safety. The last test was conducted on August 16, 2024. Personnel are dedicated to the high risk function by using distinctive equipment and protective clothing with separate access points, and staff entering these areas change into clean clothing or don temporary protective outerwear. Employees working in the high risk area were observed to follow high standards of personal hygiene with minimal risk to the controlled environment and product. Product transfer points were designed to minimize the risk of cross contamination.

9.7.2 Thawing of Food Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.7.2.1	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.	Compliant	
9.7.2.2	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.	Not Applicable	The facility does not conduct air thawing of products. N/A
9.7.2.3	Provision shall 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.	Compliant	

SS 9.7.2 Thawing of Food Summary

Thawing of frozen raw materials takes place in areas and equipment appropriate for the purpose. The site water thaws frozen fish and seafood by placing the packaged products in blue plastic combo with water entering the top and draining at the bottom for continuous flow. Water thawing was observed, and a continuous flow of water at an appropriate temperature is used. Overflow water is discharged directly to the plant drainage system. 9.7.2.2 The facility does not conduct air thawing of products. N/A

9.7.3 Control of Foreign Matter Contamination Module 9 GMP for Processing of Animal Products

Element	Description	Primary Response	Evidence
9.7.3.1	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.	Compliant	
9.7.3.2	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	Compliant	

	made from these materials, or measurement instruments with glass dial covers, 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.		
9.7.3.3	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.	Compliant	
9.7.3.4	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.	Compliant	
9.7.3.5	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.	Compliant	
9.7.3.6	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.	Compliant	
9.7.3.7	Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard.	Compliant	
9.7.3.8	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.	Compliant	
9.7.3.9	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).	Compliant	

SS 9.7.3 Control of Foreign Matter Contamination Summary

Policy Foreign Materials Control SOP defines the methods and responsibilities to prevent foreign material contamination. The policy's implementation was demonstrated by pre-operational 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 August 27, 2024. 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 August 27, 2024 was reviewed and found to be completed as scheduled. 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, QA Manager or Production 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. Periodic maintenance inspections include looking for loose objects and potential contaminants from overheads. Rubber gaskets, any rubber impellers, and other equipment made of materials that can wear or deteriorate are inspected in accordance with the Preventative Maintenance Schedule. Rubber gaskets and seals are inspected during pre-operational inspections and documented for condition.

9.7.4 Detection of Foreign Objects Module 9 GMP for Processing of Animal Products			
Element	**Description**	**Primary Response**	**Evidence**
9.7.4.1	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.	Compliant	
9.7.4.2	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.	Not Applicable	N/A The site does not use devices for metal or physical contamination detection.
9.7.4.3	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.	Not Applicable	N/A The site does not use devices for metal or physical contamination detection.
9.7.4.4	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.	Compliant	
9.7.4.5	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.	Compliant	
SS 9.7.4 Detection of Foreign Objects Summary			
A policy defining the methods and responsibilities for the use of foreign material detection has been documented and implemented. Demonstration and documentation of the methods used were observed during the audit inspection. Interviews with employees responsible for the monitoring indicated they were knowledgeable and understood what to do if the devices failed when tested with known samples. Due to the products being seafood, the site visually inspects the products for any metal or physical contamination. Records reviewed demonstrated the site was verifying the visual monitoring, documenting any objects rejected or removed by them, and implementing corrective actions. 9.7.4.2 – 9.7.4.3 N/A The site does not use devices for metal or physical contamination detection.			

9.8.1 Waste Disposal Module 9 GMP for Processing of Animal Products			
Element	**Description**	**Primary Response**	**Evidence**
9.8.1.1	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.	Compliant	
9.8.1.2	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	Compliant	

	maintained in a clean and tidy condition until external waste collection is undertaken.		
9.8.1.3	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.	Compliant	
9.8.1.4	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.	Compliant	
9.8.1.5	Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.	Compliant	
9.8.1.6	Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials or 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.	Not Applicable	Controlled disposal of trademarked materials is not required at the site. N/A
9.8.1.7	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.	Compliant	
9.8.1.8	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.	Compliant	
9.8.1.9	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.	Compliant	
9.8.1.10	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.	Compliant	

SS 9.8.1 Waste Disposal Summary

A policy defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented, is found in Waste Removal SOP. 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. Waste water is discharged to plant drains and collected for disposal to the municipality's waste water system. Inedible waste designated for animal feed is handled and stored so as not to pose a risk to the animal or to further processing. 9.8.1.6 Controlled disposal of trademarked materials is not required at the site. N/A

11.1.1 Premises Location and Approval Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
SS 11.1.1 Premises Location and Approval Summary			
This section was addressed in Module 9.			

11.1.2 Building Materials Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
11.1.2.2	Drains shall be constructed and located so they can be easily cleaned and not present a hazard.	Compliant	
11.1.2.3	Waste trap system shall be located away from any food handling areas or entrances to the premises.	Compliant	
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.	Compliant	
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.	Compliant	

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.	Compliant	
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.	Compliant	
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.	Compliant	
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).	Compliant	
SS 11.1.2 Building Materials Summary			
This section was addressed in Module 9.			

11.1.3 Lightings and Light Fittings Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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	Compliant	

	cleanable materials, and addressed in the cleaning and sanitation program.		
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.	Compliant	

SS 11.1.3 Lightings and Light Fittings Summary
This section was addressed in Module 9.

11.1.4 Inspection/ Quality Control Area Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	

SS 11.1.4 Inspection/ Quality Control Area Summary
This section was addressed in Module 9.

11.1.5 Dust, Insect, and Pest Proofing Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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	Compliant	

	pest-proof annex; and v. Adequate sealing around trucks in docking areas.		
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.	Compliant	

SS 11.1.5 Dust, Insect, and Pest Proofing Summary

This section was addressed in Module 9.

11.1.6 Ventilation Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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).	Compliant	
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.	Compliant	

SS 11.1.6 Ventilation Summary

This section was addressed in Module 9.

11.1.7 Equipment and Utensils Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence

11.1.7.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.1.7.9	Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal 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.	Compliant	

SS 11.1.7 Equipment and Utensils Summary

This section was addressed in Module 9.

11.1.8 Grounds and Roadways Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
11.1.8.3	Paths from amenities leading to site entrances shall be effectively sealed.	Compliant	
SS 11.1.8 Grounds and Roadways Summary			
This section was addressed in Module 9.			

11.2.1 Repairs and Maintenance Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.2.1.4	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.	Compliant	

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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 11.2.1 Repairs and Maintenance Summary

This section was addressed in Module 9.

11.2.2 Maintenance Staff and Contractors Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
11.2.2.1	Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).	Compliant	
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.	Compliant	
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.	Compliant	

SS 11.2.2 Maintenance Staff and Contractors Summary

This section was addressed in Module 9.

11.2.3 Calibration Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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.	Compliant	
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.	Compliant	
11.2.3.3	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.	Compliant	
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.	Compliant	
11.2.3.5	Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.	Compliant	
11.2.3.6	A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.	Compliant	
SS 11.2.3 Calibration Summary			
This section was addressed in Module 9.			

11.2.4 Pest Prevention Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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	Compliant	

	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.		
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.2.4.5	Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.	Compliant	
11.2.4.6	No animals shall be permitted on-site in food handling and storage areas.	Compliant	

SS 11.2.4 Pest Prevention Summary

This section was addressed in Module 9.

11.2.5 Cleaning and Sanitation Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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	Compliant	

	storing cleaned utensils shall be provided as required.		
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 11.2.5 Cleaning and Sanitation Summary

This section was addressed in Module 9.

11.3.1 Personnel Welfare Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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. A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.	Compliant	
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.	Compliant	
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	Compliant	

	suitable waterproof and colored dressing.		

SS 11.3.1 Personnel Welfare Summary

This section was addressed in Module 9.

11.3.2 Handwashing Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.3.2.4	The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.	Compliant	
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.	Compliant	
11.3.2.6	When gloves are used, personnel shall maintain the handwashing practices outlined above.	Compliant	

SS 11.3.2 Handwashing Summary

This section was addressed in Module 9.

11.3.3 Clothing and Personal Effects Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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.	Compliant	
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.	Compliant	
11.3.3.3	Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.	Compliant	
11.3.3.4	Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
SS 11.3.3 Clothing and Personal Effects Summary			

This section was addressed in Module 9.

11.3.4 Visitors Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
11.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.	Compliant	
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.	Compliant	

SS 11.3.4 Visitors Summary

This section was addressed in Module 9.

11.3.5 Staff Amenities (change rooms, toilet, break rooms) Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.3.5.4	Provision shall be made for staff to store their street clothing and personal items	Compliant	

	separate from clean uniforms, food contact zones, food, and packaging storage areas.		
11.3.5.5	Where required, a sufficient number of showers shall be provided for use by staff.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
SS 11.3.5 Staff Amenities (change rooms, toilet, break rooms) Summary			
This section was addressed in Module 9.			

11.4.1 Staff Engaged in Food Handling and Processing Operations Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**

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; iv. 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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
SS 11.4.1 Staff Engaged in Food Handling and Processing Operations Summary			

This section was addressed in Module 9.

11.5.1 Water Supply Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.5.1.6	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.	Compliant	

SS 11.5.1 Water Supply Summary

This section was addressed in Module 9.

11.5.2 Water Treatment Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
11.5.2.1	Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment.	Compliant	

	Water treatment equipment shall be monitored regularly to ensure it remains serviceable.		
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).	Compliant	
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.	Compliant	
SS 11.5.2 Water Treatment Summary			
This section was addressed in Module 9.			

11.5.3 Water Quality Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	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.	Compliant	
11.5.3.3	Water and ice shall be analyzed using reference standards and methods.	Compliant	
SS 11.5.3 Water Quality Summary			
This section was addressed in Module 9.			

11.5.4 Ice Supply Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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.	Compliant	
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.	Compliant	
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.	Compliant	
SS 11.5.4 Ice Supply Summary			
This section was addressed in Module 9.			

11.5.5 Air and Other Gasses Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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.	Compliant	
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.	Compliant	
SS 11.5.5 Air and Other Gasses Summary			
This section was addressed in Module 9.			

11.6.1 Receipt, Storage and Handling of Goods Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**

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

SS 11.6.1 Receipt, Storage and Handling of Goods Summary

This section was addressed in Module 9.

11.6.2 11.6.2 Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	

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

SS 11.6.2 Cold Storage, Freezing and Chilling of Foods Summary

This section was addressed in Module 9.

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	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.	Compliant	

SS 11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods Summary

This section was addressed in Module 9.

11.6.4 Storage of Hazardous Chemicals and Toxic Substances Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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	Compliant	

	and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.		
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.	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-inprogress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.	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.	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.	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.	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.	Compliant	
SS 11.6.4 Storage of Hazardous Chemicals and Toxic Substances Summary			

This section was addressed in Module 9.

11.6.5 Loading, Transport, and Unloading Practices Module 11 GMP for Processing of Food Products			
Element	**Description**	**Primary Response**	**Evidence**
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.	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.	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.	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.	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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
SS 11.6.5 Loading, Transport, and Unloading Practices Summary			

This section was addressed in Module 9.

11.7.1 High-Risk Processes Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
11.7.1.3	Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.	Compliant	
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.	Compliant	
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.	Compliant	

SS 11.7.1 High-Risk Processes Summary

This section was addressed in Module 9.

11.7.2 Thawing of Food Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	

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.	Compliant	
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.	Compliant	

SS 11.7.2 Thawing of Food Summary

This section was addressed in Module 9.

11.7.3 Control of Foreign Matter Contamination Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	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.	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.	Compliant	
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.	Compliant	
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.	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.	Compliant	
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.	Compliant	
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.	Compliant	
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).	Compliant	

SS 11.7.3 Control of Foreign Matter Contamination Summary

This section was addressed in Module 9.

11.7.4 Detection of Foreign Objects Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	

SS 11.7.4 Detection of Foreign Objects Summary
This section was addressed in Module 9.

11.8.1 Waste Disposal Module 11 GMP for Processing of Food Products

Element	Description	Primary Response	Evidence
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.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
11.8.1.5	Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.	Compliant	
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.	Compliant	
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.	Compliant	
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.	Compliant	
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	Compliant	

	the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.		
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.	Compliant	
SS 11.8.1 Waste Disposal Summary			
This section was addressed in Module 9.			