

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
169 | 94736

DECISION DATE
10/14/2019

AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
09/13/2020

AUDIT DATES
09/11/2019 - 09/13/2019

EXPIRATION DATE
11/27/2020

ISSUE DATE
10/14/2019

Facility & Scope

AdvancePierre Foods (39094)

AdvancePierre Foods - Claremont
3437 East Main St.
Claremont, NC 28610
United States

Food Sector Categories:

13. Bakery and Snack Food Processing
20. Recipe Meals Manufacture

Products:

Baking of rolls, biscuits, and buns used for in house ready to eat meat, poultry, and seafood sandwich assembly.

Scope of Certification:

Baking of rolls, biscuits, and buns used for in house ready to eat meat, poultry, and seafood sandwich assembly.
Exclusions: None

Certification Body & Audit Team

FSNS Certification and Audit LLC

199 West Rhapsody
San Antonio, TX 78216
United States

CB#: 638302

Accreditation Body: ANSI

Accreditation Number: 1107

Lead Auditor: Rice, Meghan (200916)

Technical Reviewer: DeFord, Tamara (205569)

Hours Auditing: 2

Hours Writing Report: 2

Audit Statements

Opening Meeting	<p>People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p>RESPONSE: Tim Palmer: Quality Systems Supervisor, Michael Doedin: Plant Manager, Terry Willis: Sanitation Manager, Jason Arrowood: Quality Supervisor, Paul Kidd: Sandwich Assembly Manager, Felicia Grant: Safety Manager, Annette Forbes: HR Supervisor.</p>
Facility Description	<p>Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)</p> <p>RESPONSE: The facility started as a bakery and sandwich operation originally built in 1981. The company was later acquired by Advance Pierre in 2008 and Tyson in 2017. The current 200,000 sqft facility operated with 780 employees five to six days per week on 20 production lines. The facility produced approximately 2.7 million pounds of retail and foodservice weekly.</p>
Closing Meeting	<p>People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)</p> <p>RESPONSE: Tim Palmer: Quality Systems Supervisor, Michael Doedin: Plant Manager, Terry Willis: Sanitation Manager, Jason Arrowood: Quality Supervisor, Paul Kidd: Sandwich Assembly Manager, Shawn Jones: Quality Manager, Annette Forbes: HR Supervisor.</p>
Auditor Recommendation	<p>Auditor Recommendation</p> <p>RESPONSE: certification</p>

Section Responses

2.1.1 Quality Policy

The Commitment Statement outlined commitment to assure product quality through consistent conformance to: customer expectations, product specifications, regulatory requirements, product wholesomeness, and expected profitability. These activities were performed with the ultimate goal of ensuring the consistent production of safe and legal products, with the desired quality characteristics, in full compliance with the HACCP Food Safety System and Food Quality System. The Policy was signed by the Plant Manager and FSQA Manager on 6/5/19 and was displayed at entrances to the facility and in the breakroom in English, Spanish, and Hmong. Commitment was discussed during orientation and annual training. Senior management established food safety and quality objectives for continuous improvement.

- 2.1.1.1** The policy statement prepared and implemented by senior site management to communicate their commitment to food safety shall also include at a minimum: i. The site's commitment to establish quality objectives; ii. The site's commitment to comply with customers' quality requirements; iii. The methods used to measure the site's quality objectives, and iv. The site's commitment to continually improve its quality performance.

RESPONSE: COMPLIANT

- 2.1.1.2** The site's vision and mission statement shall also be displayed in a prominent position and communicated to all staff. The vision and mission statement may be included in, or separate from, the organization's food safety policy.

RESPONSE: COMPLIANT

2.1.2 Management Responsibility

The Claremont Plant organizational chart outlined the Plant Manager down to the Department Supervisors. Senior management was committed to providing resources to achieve food safety objectives and support the development, implementation, maintenance, and ongoing improvement of the SQF System. The Quality Systems Supervisor was designated as the SQF Practitioner with alternates designated as the QA Manager and FSQA Supervisors. The SQF Practitioner was a full time employee, had formal HACCP training (8/4/16), PCQI training (8/17/16), Lean Six Sigma Black Belt Certification (August 2009), and SQF Practitioner training (8/17/16) and had several years of industry experience. Orientation training included food safety and quality reporting requirements. Job Descriptions included summary, essential duties and responsibilities, skill level guidelines, qualifications, education and/or experience, physical demands, work environment, and reporting structure. The Management Team was committed to provide the appropriate resources necessary to ensure our success and compliance with customer and regulatory requirements. Food Safety and quality objectives were established annually and included: customer complaints (25 CPMU monthly), first time quality (97%), defects (780 DPMU), environmental swabs (.6% month), pre-op APC and ATP (5% per month). The facility reviewed objectives weekly with senior management. The facility was currently meeting objectives. Actions were implemented where objectives were previous not met.

- 2.1.2.1** The reporting structure shall identify personnel performing key process steps and responsible for achieving quality requirements.

RESPONSE: COMPLIANT

2.1.2.2	<p>The senior site management shall develop quality objectives and a process by which quality performance is measured.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.3	<p>The senior site management shall ensure adequate resources are available to achieve quality objectives and customer quality requirements, and to support the development, implementation, maintenance and ongoing improvement of the SQF Quality System.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.4	<p>Senior site management shall designate an SQF quality practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review and maintenance of the SQF Quality System including quality fundamentals outlined in 2.4.2, and the quality plan outlined in 2.4.3; ii. Take appropriate action to ensure the integrity of the SQF Quality System; iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF Quality System; and iv. Ensure that site personnel have the required competencies to carry out those functions affecting product quality.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.5	<p>In addition to the SQF Food Safety Code requirements, the SQF quality practitioner shall: i. Be competent to implement and maintain HACCP-based food quality plans; ii. Understand the SQF Quality Code and the requirements to implement and maintain a quality management system; and iii. Be competent in statistical process control (SPC) and/or other quality tools to reduce process variation and drive root cause analysis of non-conformities.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.6	<p>Senior site management shall ensure site personnel responsible for performing key process steps and meeting customer requirements, and corporate quality requirements where applicable, have the required competencies to carry out those functions.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.7	<p>Senior site management shall develop and implement a quality communication program to ensure that all staff are informed of their quality responsibilities, are aware of their role in meeting the requirements of the SQF Quality Code, and are informed of the organization's performance against quality objectives. The program shall include: i. the defined vision and mission statement of the site; ii. the site's quality objectives and the process by which quality performance is measured, and iii. The methods by which customer quality requirements, and corporate quality requirements where applicable, are met.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.8	<p>Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provision to cover for the absence of key personnel.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.9	<p>Senior site management shall establish a process to trend progress in quality performance against agreed measures. Benchmarking shall be part of this process and the performance data shall be reported at least annually to demonstrate effectiveness of the quality management System, and communicated to all staff.</p> <p>RESPONSE: COMPLIANT</p>
2.1.2.10	<p>Sites that are certified to the SQF Quality Code may use the SQF quality shield. Use of the SQF quality shield shall follow the requirements outlined in Appendix 5: SQF Quality Shield Rules of Use.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: Quality shield was not utilized.</p>
2.1.3	<p>Management Review</p> <p>Monthly Food Safety and Quality team meetings included HACCP, USDA, FDA, NRs, New Products, Process Changes, New Equipment or Construction, Quality System SPC Data, CQP Issues, SQF Audit, SQF Quality Plan, Module Audits, Customer Audits, Customer Comments, Micro Results, Pest Control, GMP Issues, and other food safety issues. Meeting records were provided from the previous eight months. The Food Safety Plan, Quality Plan, and pre-requisite programs were reviewed annually or when changes occurred that may affect product safety. An annual SQF Systems Review was conducted with Senior Management.</p>
2.1.3.1	<p>The senior site management shall be responsible for reviewing the SQF Quality Code. Reviews shall include actions required to: i. Monitor specification compliance and corrective actions taken; ii. Reduce process and product variation; iii. Meet customer requirements; iv. Ensure sufficient resources are allocated to maintain, and improve the performance of the Quality System.</p> <p>RESPONSE: COMPLIANT</p>

2.1.3.2	<p>The senior site management and SQF quality practitioner shall meet to review the implementation and maintenance of the Quality System at least monthly, and the SQF Quality System in its entirety shall be reviewed at least annually.</p> <p>RESPONSE: COMPLIANT</p>
2.1.3.3	<p>The Quality System, including food quality plans, shall be reviewed when any changes are implemented that have an impact on the site's ability to meet customer requirements and corporate quality requirements where applicable.</p> <p>RESPONSE: COMPLIANT</p>
2.1.3.4	<p>Senior site management shall ensure the integrity and continued operation of the Quality System in the event of organizational or personnel changes within the company or associated facilities.</p> <p>RESPONSE: COMPLIANT</p>
2.1.3.5	<p>The senior site management shall document and implement a change management process that details how changes in specifications, materials, equipment or resources are evaluated for their impact on quality, communicated to customers and effectively implemented.</p> <p>RESPONSE: COMPLIANT</p>
2.1.3.6	<p>Records of all Quality System reviews and reasons for amending documents, and changes to the SQF Quality System shall be maintained. Records shall include decisions for actions related to improvement of the Quality System and process effectiveness.</p> <p>RESPONSE: COMPLIANT</p>
2.1.4	<p>Complaint Management</p> <p>Consumer Comments Policy outlined methods for managing and trending customer complaints. Complaints were received through Consumer Relations team and notified site FSQA Manager for investigation and follow-up. The Plant Response Form included date of response, reference number, customer, item, product date code, description of complaint, investigation, corrective action taken, and preventive action. Weekly and monthly trending was conducted by complaint and included in weekly and monthly meetings. Missing components, mold, and open seals were the top three complaints. Unaddressed trends were not observed.</p>
2.1.4.1	<p>The complaint management process shall include a requirement to identify and resolve the cause of all quality complaints resulting from activities at the site.</p> <p>RESPONSE: COMPLIANT</p>
2.1.4.2	<p>Trends in quality complaints shall be included in the performance measures established for the Quality System.</p> <p>RESPONSE: COMPLIANT</p>
2.1.4.3	<p>Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.3.</p> <p>RESPONSE: COMPLIANT</p>
2.1.4.4	<p>Records of quality complaints, their investigation and resolution (if applicable) shall be maintained.</p> <p>RESPONSE: COMPLIANT</p>
2.1.5	<p>Crisis Management Planning</p> <p>The Business Continuity Planning SOP outlined the crisis management team and responsibilities, emergency contact list, external contacts, and included provisions for power outage, pandemic event, intentional product contamination, unforeseen crisis, natural and/or environmental disaster. The Plant Manager was designated as the Crisis Management Team lead. The plan was most recently reviewed on 3/8/19. The crisis plan was tested on 9/11/19 for a tornado incident. The facility was simulated as down for a few days.</p>
2.1.5.1	<p>The crisis management plan prepared by senior management shall include the methods by which the site shall, in the event of a crisis, maintain continuity of supply that meets the customers' product and service quality requirements.</p> <p>RESPONSE: COMPLIANT</p>
2.1.5.2	<p>The site shall contact their customers in the event of a crisis that impacts their ability to supply quality product.</p> <p>RESPONSE: COMPLIANT</p>
2.2.1	<p>Quality Management System</p> <p>Food safety and quality manuals were developed which included the policy statement, organizational chart, policies, procedures and SOPs necessary to implement and maintain the SQF system. The manuals were maintained in printed form and available in the QA office for reference. The manual was printed in English with translators available as needed.</p>

2.2.1.1 A quality manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site uses to meet the requirements of the SQF Quality Code, be made available to staff, and include: i. A summary of the organization's quality policies and the methods it will apply to meet the requirements of the SQF Quality Code; ii. The policy statement and site organization chart; iii. A list of the products covered under the scope of certification; iv. Finished product specifications agreed with customers' or corporate quality requirements where applicable; and v. Statistical process control methods and other quality tools that are used to control and reduce process variation. The quality manual may be incorporated into, or independent from the SQF food safety manual, and shall be signed by senior management.

RESPONSE: COMPLIANT

2.2.2 Document Control

Record Keeping Program outlined procedures for identifying, naming, controlling, and removal of obsolete controlled documents. Controlled documents were identified with the document name, document number, issued date, and replaced date. The Senior HACCP Supervisor was responsible for implementation of the program. Obsolete documents were removed from use. Documents were stored in a restricted access shared drive and printed weekly for use by authorized personnel. Photocopies of documents were not permitted. SOP and Forms Register were provided and included document number, title, reviewed date, and reviewer. Document revision history was included at the end of each program.

2.2.2.1 The methods and responsibility for maintenance, storage, and distribution of quality documents shall be the same as those required for SQF Food Safety System documentation.

RESPONSE: COMPLIANT

2.2.3 Records

Record Keeping Policy outlined procedures for generating genuine, legible records and ensuring records were readily accessible. Record completion guidelines included the use of blue ink. Correction guidelines identified no obliterations, no correction fluid or tape (white-out), and the use of a single line, initial and date on corrections. Electronic records format was still under development. Records were maintained for five years.

2.2.3.1 The methods and responsibility for authorization, accessibility, retention and storage of quality records shall be the same as those required for SQF Food Safety System records.

RESPONSE: COMPLIANT

2.3.1 Product Development and Realization

Product Development and Realization Program was outlined methods and responsibilities for designing, developing, and converting product concepts to commercialization. Products were developed through three business units: retail, food service, and foodservice industrial. New concepts were initiated through the R&D team in Product Data Management (PDM). Activities included discovery, concept, feasibility, development, and launch. New products for the facility were similar to the current product line. Plant trials were conducted to determine production capabilities. Products were developed as line extension; sandwich assembly. New product approval was conducted through PDM. Project calls were conducted for product status. Shelf life was based off similar products. Shelf life was established as 12 months or less. Shelf life determination was verified and validated by R&D through accelerated shelf life studies, real time shelf life studies, and/or established through examination of existing like products. Shelf life was based on product staying frozen to the customer. Retention product from held per customer request and evaluated for on-going shelf life. Quarterly shelf life was reviewed at intervals to the end of the stated shelf life and evaluated for sensory as daily product cutting. Changes to the HACCP/Food Safety plans and Quality plans were validated. Consumer preparation instructions, heating instructions, storage, and handling instructions were validated by R&D.

2.3.1.1 The methods for designing, developing and converting product concepts to commercial realization shall include a process capability analysis to ensure that processes are able to consistently supply products that meet customer specifications.

RESPONSE: COMPLIANT

2.3.1.2 Product formulation, manufacturing processes and the fulfillment of product quality requirements shall be validated by facility trials and product testing.

RESPONSE: COMPLIANT

2.3.1.3 Shelf life trials shall be conducted to establish and validate a product's packaging, handling, storage and customer use requirements through to the end of its commercial life and consumer use.

RESPONSE: COMPLIANT

2.3.1.4 A food quality plan shall be validated and verified for each new product and its associated process from conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food quality.

RESPONSE: COMPLIANT

2.3.1.5 Records of all quality tests, product design, process development, and shelf life trials associated with product changes or new product development shall be maintained.

RESPONSE: COMPLIANT

2.3.2 Raw and Packaging Materials

Raw and Packaging Materials Specifications SOP outlined requirements for material specifications, Certificate of Analysis (COA) where applicable, Certificate of Conformance (COC), and Letters of Guarantee (LOG). Label approval was the responsibility of Corporate QA. A Register of raw and packaging material specifications was provided electronically. Raw material specifications included required testing results for COA, microbiological, chemical, physical, packaging and labeling, shelf life, and storage requirements as applicable. Labels were verified at receiving for accuracy of information including allergen and ingredient statements.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

- 2.3.2.3** Product labels that are designed or specified by customers shall be approved by those customers. Records shall be maintained of customer approvals.

RESPONSE: COMPLIANT

- 2.3.2.4** The register of current raw and packaging material specifications shall include those raw and packaging materials impacting product quality and customer labels.

RESPONSE: COMPLIANT

2.3.3 Contract Service Providers

Contract Service Providers included: pest control (Orkin), laundry (Aramark), laboratory services (FSNS), specialty maintenance, chemicals (Chemtall), temporary staffing, and waste management (Bakery Feeds and Republic services). Contractors were required to review and sign the Visitor GMPs prior to entry into the facility. A Register was provided that outlined the company name, service provided, and contact information. Any contractors entering the facility were required to complete Contractor training.

- 2.3.3.1** Specifications for contract services that have an impact on in-process or finished product quality shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel.

RESPONSE: COMPLIANT

- 2.3.3.2** The register of contract service specifications shall include those services impacting product quality.

RESPONSE: COMPLIANT

2.3.4 Contract Manufacturers

Contract manufacturers were not utilized.

- 2.3.4.1** The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.

RESPONSE: NOT APPLICABLE

- 2.3.4.2** The site shall: i. Ensure that the processes in place at the contract manufacturer are capable of consistently meeting customer requirements, or corporate quality requirements where applicable; ii. Verify compliance with the SQF Quality Code and that all customer requirements are being met at all times; iii. Audit the contract manufacturer annually at a minimum to confirm compliance to the SQF Quality Code and agreed arrangements, or accept the manufacturer's certification to the SQF Quality Code or equivalent; and iv. Ensure changes to contractual agreements are approved by both parties, agreed with customers where necessary, and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

- 2.3.4.3** Records of all contract reviews and changes to contractual agreements and their approvals extend to quality records.

RESPONSE: NOT APPLICABLE

2.3.5 Finished Product Specifications

Finished Product specifications were maintained through ROSS in a job packet. Specifications were provided by specific customers or generated by the facility. A product specification for Signature Angus Cheeseburgers was provided. Job packet was printed daily for use during production. Specifications included description, raw materials, processing, finished product standards: physical, physical defect limits, counts, count defect limits, microbiological, chemical, sensory criteria, packaging information, primary and secondary containers, labeling, coding, shipping, storage, and distribution.

2.3.5.1	<p>Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and shall include product quality attributes, service delivery requirements, and labelling and packaging requirements.</p> <p>RESPONSE: COMPLIANT</p>
2.3.5.2	<p>Customer product specifications and delivery requirements shall be communicated to appropriate departments and staff within the site.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.1 Customer Requirements</p> <p>Customer expectations were communicated through the Finished Product Specifications. Customer notification was required in the event an interruption in supply occurred.</p>	
2.4.1.1	<p>The requirements and expectations of customers and final consumers shall be continually reviewed to ensure the accuracy of specifications and the ability to supply to customer needs. A full review of customers' expectations for product and delivery shall occur at least annually.</p> <p>RESPONSE: COMPLIANT</p>
2.4.1.2	<p>The site shall have a procedure in place to notify essential customers where their ability to supply product that meets customer specifications is temporarily suspended or halted.</p> <p>RESPONSE: COMPLIANT</p>
2.4.1.3	<p>Where customer products, materials or equipment are used within the facility, the site shall have measures in place to safeguard customer property and ensure its correct and proper use.</p> <p>RESPONSE: NOT APPLICABLE</p>
<p>2.4.2 Quality Fundamentals</p> <p>The building and equipment was constructed, designed, and maintained to manufacture, handle, store, and deliver quality product that meets customer expectations. Equipment calibration where necessary was conducted to ensure customer specification compliance. Storage and transport of raw materials, work in progress, and finished product was conducted to maintained product integrity and safety.</p>	
2.4.2.1	<p>The buildings and equipment shall be constructed, designed and maintained to facilitate the manufacture, handling, storage and/or delivery of food that meets customer specifications or corporate quality requirements.</p> <p>RESPONSE: COMPLIANT</p>
2.4.2.2	<p>The methods and responsibility for the calibration of measuring, test and inspection equipment used for quality testing of raw materials, work-in-progress, and finished product, food quality 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.</p> <p>RESPONSE: COMPLIANT</p>
2.4.2.3	<p>Storage and transport of raw materials, work-in progress, and finished product shall be suitable to maintain the integrity of the product without loss, waste or damage.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.3 Food Quality Plan</p> <p>A quality team was established which was the same as the food safety team. The SQF Quality Practitioner was the designated team leader. The site had developed two Quality Plans: Sandwich/Traypack and Bakery. Product descriptions and flow charts were developed for each plan utilizing the format and flow as described in the Food Safety Module. A risk analysis was conducted for each process step on the flow chart for potential quality hazards associated with the process step. Examples of quality hazards included damaged missing seals, trailer temperature, trailer condition, correct product, damaged packages or containers, foreign objects, damaged packaging, presence of mill insects, FIFO rotation, correct ingredients used, correct mix used, correct portion weight, correct seed, correct rise of dough, oven temperature correct, correct oven dwell time, product temperature acceptable, metal detector working properly, correct slice, correct seal, acceptable wrapper seal, correct number of portions wrapped, correct number of pillow packs in a tray, correct number of portions/bags, packed, correct box used, correct label in use, correct code dates applied, bread shelf life, freezer temperature acceptable, ensure trailer refer, is properly set, ensure trailer is clean and undamaged, and mixed product. The facility identified one CQP in each process. CQP - Product labeling at packaging. Label verification was conducted at start and end of each run. Quality points were identified though the process to control spoilage, wrong ingredient used, underweight product, over/under baked, ingredient/label change, missing component, poor seals, correct film version and orientation, mixed product in units, mixed product in cases, and correct label. Corrective actions for CQP failures included placing product on hold for further sampling and evaluation. The plans were reviewed and verified when changes occurred or a minimum of annually. The most recent review was conducted on 4/30/19.</p>	
2.4.3.1	<p>A food quality plan shall be developed, effectively implemented, and maintained in accordance with the Codex Alimentarius Commission HACCP method. The food quality plan may be combined with, or independent from, the food safety plan, but must separately identify quality threats and their controls, and critical quality points.</p> <p>RESPONSE: COMPLIANT</p>

2.4.3.2	<p>The food quality plan shall outline the means by which the site controls and assures the quality attributes of the products or product groups and their associated processes.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.3	<p>The food quality plan shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and marketing knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food quality team. The composition of the food quality team may be different from the food safety team.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.4	<p>The scope of the food quality plan shall be developed and documented including the start and end-point of the process under consideration and all relevant inputs and outputs.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.5	<p>Product descriptions shall be developed and documented for all products included in the scope of the food quality plan. This shall include information in the finished product specifications (refer to 2.3.5.1) plus any additional quality or service attributes established by agreement with the customers.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.6	<p>The intended use of each product shall be determined and documented by the food quality team. This shall include as appropriate target consumer groups, ease of use by consumers, consumer instructions, tamper evidence, and other applicable information affecting product quality.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.7	<p>The food quality team shall review the flow diagram developed and confirmed as part of the food safety plan, and ensure process steps, process delays, and inputs that impact product quality are included.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.8	<p>The food quality team shall identify and document all quality threats that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.9	<p>The food quality team shall conduct a quality threat analysis for every identified quality threat, to identify which threats are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure or maintain product quality. The methodology for determining threat significance shall be documented and used consistently to assess all potential quality threats.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.10	<p>The food quality team shall determine and document the control measures that must be applied to all significant quality threats. More than one control measure may be required to control an identified threat, and more than one significant threat may be controlled by a specific control measure.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.11	<p>Based on the results of the threat analysis (refer to 2.4.3.9), the food quality team shall identify the steps in the process where control must be applied to eliminate a significant threat or reduce it to an acceptable level. These steps shall be identified as Critical Quality Points or CQPs.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.12	<p>For each identified CQP, the food quality team shall identify and document the quality limits that separate acceptable from unacceptable product. The food quality team shall validate the critical quality limits to ensure the designated level of control of the identified quality threat (s); and that all critical quality limits and control measures individually or in combination effectively provide the level of control required.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.13	<p>The food quality team shall develop and document procedures to monitor CQPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.</p> <p>RESPONSE: COMPLIANT</p>

<p>2.4.3.14</p>	<p>The food quality team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CQP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the quality failure.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.3.15</p>	<p>The documented and approved food quality plan shall be fully implemented. The effective implementation shall be monitored by the food quality team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, specifications or inputs occur which may affect product quality.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.3.16</p>	<p>Implemented food quality plans shall be verified as part of SQF Quality System verification (refer to 2.5).</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.4 Approved Supplier Program</p> <p>Supplier Approval Procedure outlined suppliers were required to provide Product Specifications, Letter of Guarantee (LOG), and last GFSI third party/certification conducted within the last year. Packaging suppliers were required to provide a letter of conformance for food contact packaging. Supplier approval documentation was maintained through Corporate FSQA. Supplier documentation was reviewed annually. Emergency substitutions were not permitted. Suppliers were monitored through inbound inspections of materials and supplier performance review. Supplier Corrective Action Record (SCAR) were reviewed during monthly management review meetings. Corporate FSQA and Procurement trend supplier foreign material incidents. An Approved Supplier Register was provided. Supplier approval information associated with materials in section 2.6.2 were current.</p>	
<p>2.4.4.1</p>	<p>Raw materials, ingredients, packaging materials, and services that impact on finished product quality shall be supplied by an approved supplier.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.4.2</p>	<p>Material suppliers shall be selected and approved based on their ability to supply materials that meet quality specifications. The evaluation program shall require suppliers to: i. Maintain controlled and current copies of specifications; ii. Have processes that are capable of consistently supplying materials that meet specification and other defined quality metrics (e.g. delivery, service, adherence to specifications, etc.); iii. Be certified to a second or third party quality management system; and iv. Have a complaints and corrective action process in place.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.4.3</p>	<p>Material suppliers shall only be accepted into the facility based on either certificates of analysis for every lot received, or inspection at receipt to ensure materials comply with specification. All receipts shall be visually inspected for damage and product integrity.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.4.4</p>	<p>The approved supplier program shall include an agreement with suppliers for the return or disposal of materials that fail to meet specifications or are damaged or contaminated.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.5 Non-conforming Product or Equipment</p> <p>Control of Non-Conforming Product Policy outlined procedures for identifying, segregating, retaining and the disposition of non-conforming product, labels, or equipment. Sensitive/food safety holds were included orange tape, hold placard, and electronic hold. Non-conforming equipment was removed from the processing area when possible. When removal was not possible, Hold Placards were placed on equipment. FSQA supervision had authority to release product. The Holds Report was generated weekly and included date, hold number, product, quantity, reason for hold, disposition category, and disposition. Electronic holds were in place in the inventory system (ROSS). Hold product was not eligible for shipping. All hold product was subject to inspection prior to processing if deemed acceptable.</p>	
<p>2.4.5.1</p>	<p>Non-conforming product shall include products that fail to meet quality specifications.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.5.2</p>	<p>Non-conforming equipment shall include equipment that is not suitable for use, and is not capable of producing products that meet quality specifications.</p> <p>RESPONSE: COMPLIANT</p>
<p>2.4.5.3</p>	<p>The site shall document and implement a procedure to accept returned product that does not meet finished product specifications. The procedure shall include handling of returned goods to prevent redistribution or contamination of other products.</p> <p>RESPONSE: NOT APPLICABLE</p> <p>EVIDENCE: Return product was not accepted.</p>

2.4.6 Product Rework

Product Rework Policy outlined rework acceptability. Bakery dough scrap was rework directly back into the mixer during product run. Regrind bakery goods were defects identified after the oven and used at a maximum rate back into like into like product. If regrind was not fully used during the processing day, it was frozen and used up to the end of the production week. Carryover rework cycle was broken over the weekend. Regrind carryover was identified with a ROSS WIP label for traceability. Sandwich rework was identified as reassembly, re-label, or re-boxing of finished product maintaining the original lot code.

- 2.4.6.1 Procedures shall be documented and implemented to ensure product quality or formulation is not compromised by the rework process.

RESPONSE: COMPLIANT

2.4.7 Product Release

Products were subject to pre-shipment records review in accordance with regulatory requirements. Finished products were placed onto an automatic hold status pending pre-shipment review. Pre-shipment review was conducted daily following review of pre-requisite program review, HACCP review, and quality requirements.

- 2.4.7.1 The site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer requirements including, but not limited to, product specifications, sensory, packaging and package integrity, labelling, delivery and service requirements.

RESPONSE: COMPLIANT

- 2.4.7.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness

SQF Validation Schedule outlined validation requirements for CCPs/PCs and pre-requisite programs. Validation activities were conducted annually or as changes occurred to processes. Validation was the responsibility of the SQF Practitioner and backup SQF Practitioner. CQPs were supported with scientific or regulatory resources, in-house validation, and pre-requisite programs were supported with records review. Validation records from YTD 2019 provided supported the programs.

- 2.5.1.1 Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.

RESPONSE: COMPLIANT

- 2.5.1.2 Records of validation of quality criteria shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities

SQF System Verification defined verification activities for the HACCP and prerequisite programs. Records reviewed throughout the assessment evidenced that monitoring and verification activities were conducted by appropriate personnel at required frequencies. HACCP verification activities included daily direct observation, record review, and thermometer calibration.

- 2.5.2.1 The verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.

RESPONSE: COMPLIANT

- 2.5.2.2 The methods, responsibility and criteria for verifying the effectiveness of monitoring critical quality points and other process and quality controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record.

RESPONSE: COMPLIANT

- 2.5.2.3 Records of the verification of quality activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action

Corrective and Preventive Actions Policy included quality or food safety related concerns in products or processes. Corrective and preventive actions were included within each program. Corrective Action forms included description, immediate corrective actions/product disposition, preventive measures, root cause, and verification. Completed corrective actions were reviewed for pre-operational inspections (pre-op), customer complaints, environmental monitoring, and internal audits. Records were completed as required. Variance Report was completed for missed documentation or documentation errors to ensure product safety was reviewed. A Variance report was provided from 6/20/19 where a metal detection check was 97 minutes between check.

- 2.5.3.1 Corrective and preventative action methods shall include the identification of the root cause and resolution of non-compliance of critical quality limits and deviations from quality requirements.

RESPONSE: COMPLIANT

2.5.3.2 Verification activities shall include a comparison of process control limits (+/- 3s) with specification limits to ensure alignment and appropriate process control corrections.

RESPONSE: COMPLIANT

2.5.4 Product Sampling, Inspection and Analysis

Processing parameters were established for control points. SPC was utilized in the bakery for internal bake temperatures and product color. Monitoring was conducted hourly and color limits were established as dark unacceptable, dark acceptable, target, light acceptable, and light unacceptable. Temperature limits were established as 210F or above, 179-209F, and 178F or below. Any one measurement in dark or light unacceptable required corrective action. Any two consecutive measurements in dark or light acceptable required corrective action. Any one measurement above or below 179F-209F required corrective action. Sensory evaluation was conducted daily. Customer required sensory was performed each shift. Sensory evaluation included flavor, aroma, and texture. Product evaluation form included lot code, seals, coding, wrap/film, labeling, and physical appearance (ingredient placement, missing components, correct order, component appearance).

2.5.4.1 Processing parameters or in-process measurements shall be established, validated, and verified at a determined frequency to meet all customer requirements.

RESPONSE: COMPLIANT

2.5.4.2 On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer expectations and meet quality objectives.

RESPONSE: NOT APPLICABLE

EVIDENCE: On-site laboratory was not present.

2.5.4.3 Statistical process control methods shall be used to effectively control and optimize production processes to improve process efficiency and product quality and reduced waste. Control charts shall be in use for control of key processes and have defined upper and lower (process) control limits (+/- 3s).

RESPONSE: COMPLIANT

2.5.4.4 A sensory evaluation program shall be in place to ensure alignment with agreed customer requirements. Sensory evaluation results shall be communicated with relevant staff and with customers where appropriate.

RESPONSE: COMPLIANT

2.5.4.5 Records of all quality inspections and analyses, and statistical analyses, shall be maintained.

RESPONSE: COMPLIANT

2.5.5 Internal Audits

Internal Audit Program outlined internal audit requirements for the facility. An audit of the entire SQF System was conducted in June 2019 by the Corporate Regulatory Quality team and FSQA from sister facilities using the Tyson FSQA/FSR audits. The auditor went through corporate Internal Auditor Training and were independent from the areas audited. The audit included non-conformances and corrective actions to the standard. Corrective actions were documented on the SQF Audit Corrective Action Report. Additional Monthly GMP Audits were conducted by senior management members and covered the entire facility. The GMP Deficiency Log within the audit included deficiency, class, repeat, responsibility, corrective action, date completed, and verification. The Records were reviewed from the previous three months which demonstrated compliance.

2.5.5.1 Internal audit plans and methods shall include food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications and customer requirements.

RESPONSE: COMPLIANT

2.5.5.2 Staff conducting the quality internal audits shall be trained and assessed in internal audit procedures and have knowledge and experience in the quality process and process control methods as they relate to the scope of certification.

RESPONSE: COMPLIANT

2.6.1 Product Identification

Pallet identification tags were applied at receiving and scanned as they were consumed in production. All materials had a scannable License Plate Number (LPN) for traceability which correlated to the item code and incoming PO. Finished product pallets were identified with an LPN for traceability through to the customer. WIP product was identified with an LPN. Finished product labels were the responsibility of the Corporate Regulatory team. Label reviews were included in the development process and at the time of printing. Packaging verifications were conducted at startup, product changeover, breaks, and end of shift. Packaging Verification check included product description, manufacturer address, USDA bug, safe handling instructions, use by/pack date, ingredient statement including allergens, net weight declarations, and box/bag information.

2.6.1.1	Finished product shall be labeled to the agreed customer, company or corporate requirements.
	RESPONSE: COMPLIANT
2.6.1.2	Product changeover procedures shall include quality attributes required to meet finished product specifications and customer requirements.
	RESPONSE: COMPLIANT
2.6.2	Product Trace
	Traceability Policy outlined procedures for traceability of raw materials, ingredients, processing aids, and packaging. Product traceability was maintained one up and one back. Trace exercises were conducted twice per year. The facility was transitioning from the ROSS system to SAP and currently used both systems. Trace exercises included ingredients (3/21/19), finished product (8/1/19), and primary packaging (5/10/19). Processing aids were traced as ingredients. Trace exercises demonstrated an effective traceability program from raw materials to customer. Exercises were completed within two hours. An auditor initiated traceability exercise was conducted for 1,409 cases of Signature Angus Cheeseburger produced on 7/3/19. The traceability exercise was completed in less than two hours with 100% recovery and included raw materials, ingredients, and packaging through to the customer. The facility showed finished product was shipped on two POs. The facility identified 639 cases were still in the distribution center inventory and 80 were in transit. The facility utilized the ROSS inventory system and shipping BOLs to demonstrate recall capabilities.
2.6.2.1	Finished product shall be traceable forward to the final customer, such as the retailer, distributor, or manufacturer.
	RESPONSE: COMPLIANT
2.6.2.2	All raw materials, ingredients, and packaging materials used in manufacturing a finished product, and processing aids associated with the product, shall be identified with the finished product lot number and traceable back to the supplier (one back).
	RESPONSE: COMPLIANT
2.6.3	Product Withdrawal and Recall
	Product Recall Procedure outlined the FSQA Director (with site assistance) was designated as the recall coordinator, communication plans, recall procedures, product recall team with responsibilities, external contacts, and customer contact list. Investigations were conducted for root cause of withdrawals, recalls, and mock exercises. Recall system was tested twice per year as outlined in section 2.6.2. Mock recalls reviewed demonstrated an effective traceability program from raw materials to customer. The certification body and SQFI were notified of a recall within 24 hours.
2.6.3.1	The site's recall and withdrawal procedures shall apply to product recalled or withdrawn due to failure to meet customer specifications or corporate quality requirements.
	RESPONSE: COMPLIANT
2.7.1	Food Fraud Vulnerability Assessment
	A vulnerability assessment of ingredients and raw materials was conducted for potential substitution or fraud including susceptibility to product substitution, mislabeling, dilution, and counterfeiting by the Corporate FSQA team. The company utilized foodfraudadvisors.com, USDA, FDA, and other industry sources for conducting the vulnerability assessment. Raw materials and ingredients were considered low risk. The assessment was reviewed on 1/9/19.
2.7.1.1	The food fraud vulnerability assessment shall include the site's susceptibility to ingredient or product substitution, mislabeling, dilution and counterfeiting that could adversely impact food quality.
	RESPONSE: COMPLIANT
2.7.1.2	A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality shall be controlled.
	RESPONSE: COMPLIANT
2.8.1	General Requirements for Identity Preserved Foods
	Identity preserved products were not produced.
2.8.1.1	The methods and responsibility for the identification and processing of food and other products requiring the preservation of their identity preserved status (e.g. Kosher, HALAL, organic, GMO-free, regional provenance, free from, free trade etc.) shall be documented and implemented.
	RESPONSE: NOT APPLICABLE
2.8.1.2	Identification shall include a statement of the product's identity preserved status of all ingredients, including additives, preservatives, processing aids and flavorings.
	RESPONSE: NOT APPLICABLE

2.8.1.3	Raw material and ingredient specifications to identify preserved foods shall include requirements for their handling, transport, storage and delivery prior to use. RESPONSE: NOT APPLICABLE
2.8.1.4	Assurances concerning the raw material or ingredient's identity preserved status shall be by agreement with the supplier of the material. RESPONSE: NOT APPLICABLE
2.8.1.5	The process description shall allow for a product's identity preserved status to be maintained during manufacturing. RESPONSE: NOT APPLICABLE
2.8.1.6	The processing of identity preserved foods shall be conducted under controlled conditions such that: i. Ingredients are physically separated from ingredients identified as incompatible with the identity preserved food; ii. Processing is completed in separate rooms; or scheduled as the first production run; or carried out after the completion of a thorough sanitation of the area and equipment; and iii. Finished product is stored and transported in separate units or isolated by a physical barrier from non-specialty product. RESPONSE: NOT APPLICABLE
2.8.1.7	The identity preserved status shall be declared in accordance with legal requirements. RESPONSE: NOT APPLICABLE
2.8.1.8	Additional customer-specific requirements concerning identity preserved foods shall be included in the finished product specification described in 2.3.5, or label register, and implemented by the site. RESPONSE: NOT APPLICABLE
2.9.1	Training Requirements Training was the responsibility of FSQA, Safety, and Human resources. Personnel responsible for tasks essential to the SQF System and maintenance of food safety and regulatory requirements received appropriate training as deemed necessary by Senior Management.
2.9.1.1	Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF Quality System and the maintenance and improvement of quality requirements. RESPONSE: COMPLIANT
2.9.2	Training Program Training was conducted at new hire and annually for employees included, but was not limited to: HACCP, SQF, pest control, allergen program, food defense, foreign material program, hand washing, GMPs, and Food Safety Emergency Plan. Annual training was conducted through Alchemy including quizzes. FSQA specific training included HACCP CCP/CQP monitoring, SPS/SSOP/GMP auditing, Glass and Brittle Plastic and Monthly facility auditing, Pre-operational inspection, APC and ATP swabbing, calibration training, sensory, and labeling.
2.9.2.1	The employee training program shall include the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Process control and monitoring of critical quality points (CQPs); ii. Steps identified as critical to effective implementation of the food quality plan and the maintenance of food quality, and iii. Product inspection and testing. RESPONSE: COMPLIANT
2.9.2.2	The employee training program shall include applicable statistical process control training for line operators, quality inspectors and supervisory staff responsible for operating and inspecting key manufacturing processes. RESPONSE: COMPLIANT
2.9.2.3	The training program shall include training, calibration and proficiency testing of internal laboratory personnel. RESPONSE: COMPLIANT
2.9.3	Quality Instructions Work instructions were provided for food safety and quality activities based on job position in English.
2.9.3.1	Instructions shall be available explaining how all tasks critical to meeting customer specifications, and quality and process efficiency are to be performed. RESPONSE: COMPLIANT

2.9.4 HACCP for Quality Training Requirements

CQP training was verified for employees observed conducting monitoring during the facility assessment. Training was last conducted in May 2019.

- 2.9.4.1 Training in the application of HACCP principles for the identification and control of quality threats shall be provided to staff involved in development and maintenance of the food quality plan.

RESPONSE: COMPLIANT

2.9.5 Language

Training was provided in English.

- 2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

RESPONSE: COMPLIANT

2.9.6 Refresher Training

The Training Program outlined refresher training at least annually, or as identified by management.

- 2.9.6.1 The training program shall include provision for identifying and implementing the refresher training needs of site personnel

RESPONSE: COMPLIANT

2.9.7 Training Skills Register

Training skills register was provided for annual refresher trainings YTD 2019. Training registers identified the trainee, topic, date, and trainer. Training effectiveness was monitored through on the job observation and quizzes.

- 2.9.7.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the:
i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Supervisor's verification the training was completed and that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT