



SQF Food Safety Audit Edition 9

XF Enterprises, Inc. - InLine

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
US015753 | 160163

AUDIT RATING

DECISION DATE
09/14/2022

AUDIT TYPE
RECERTIFICATION



RECERTIFICATION DATE
08/17/2023

AUDIT DATES
08/16/2022 - 08/17/2022

Excellent

EXPIRATION DATE
10/31/2023

ISSUE DATE
09/15/2022

Facility & Scope

XF Enterprises, Inc. (53931)



Xtra Factors

InLine
304 Pedigo Drive
Pratt, KS 67124
United States

Facility Phone #: 620-672-5616
Facility Email: kevins@xtrafactors.net

Food Sector Categories:
32. Pet Food Manufacturing

Products:
Petfood Premixes

Scope of Certification:
Location: 304 Pedigo Drive, Overflow warehouse on the corner of Walnut and Pedigo; Scope Statement: Manufacture Pet Food Premix mash; Exemptions: None

Certification Body & Audit Team

Bureau Veritas Certification NA



**BUREAU
VERITAS**

16800 Greenspoint Park Drive,
Suite 300S
Houston, TX 77060
United States

Web Site: <https://www.bvna.com/>

CB#: CB-1-BVC
Accreditation Body: ANSI
Accreditation Number: 0747

Lead Auditor: Fallaw, Paul (10012)
Technical Reviewer: Rice, Ariel (210767)

Hours Spent on Site: 16
Hours of ICT Activities: 0
Hours Spent Writing Report: 8

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

Specifications for all raw materials, ingredients, additives, chemicals, processing aids and packaging are on file and current. Reviewed Doc. 23 SOP Specifications (Raw Materials, Packaging, Finished Products and Services) Rev. 3 dated 05/18/2022. Reviewed several specifications for raw and packaging materials. All raw materials require a Certificate of Analysis (COA) and all packaging components that come in direct contact with foods are required to have a Letter of Guarantee and Certificate of Conformance (COC) to ensure that they meet all regulatory guidelines. The facility acts as a contract manufacturer. Finished product labels are accurate and comply with relevant legislation and are supplied by the customer. Reviewed labels and Finished Product Specifications for MPF Cat Fry Customer Micro Premix and MPF Custom Whole Earth Farms Dof Premix. Doc. No 26 Register Contract Service Specification Rev. 3 dated 06/07/2022 is in place and includes a complete description of the services and training that any third party contract service provider must obtain prior to being employed and/or entering the facility. Reviewed Doc. No. 24 Register Raw and Packaging Materials Rev. 0 dated 05/26/2020 and Contract Service Provider Register. Since this is a stand alone facility, element 2.3.2.3 is NA. Minor-2.3.2.10 The Contract Service Provider List was not current and up-to date at the time of the audit.

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

RESPONSE: MINOR

EVIDENCE: The Contract Service Provider List was not current and up-to date at the time of the audit.

ROOT CAUSE: SQF Audit finding failure to add ServiTech to the initial Approved Contractors List as well as failure to catch it in the 2022 review.



2.3.2.8 Register
Contract Services_r3.zip

CORRECTIVE ACTION: Added Servi-Tech to the Approved Contractors List. SQF Practitioner now has a hard copy list of all Approved Contractors on her desk as a reminder and added the review and maintenance of this document annually to the Validation and Verification Schedule.



Register Approved Supplier

VERIFICATION OF CLOSEOUT: Reviewed the revised Contract Service Provider List that addressed the non-conformance. Approved.
Paul Fallaw

COMPLETION DATE: 08/18/2022 **CLOSEOUT DATE:** 09/11/2022

Audit Statements

SQF Practitioner Name	Name the designated SQF Practitioner RESPONSE: Jennifer Schmidt
SQF Practitioner Email	Email of the designated SQF Practitioner RESPONSE: jennifers@trafactors.net
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Sheldon Reiff: General Manager, John Ford: Interim Plant Manager (PCQI), Courtney Duffy: Director QC, Jennifer Schmidt: SQF Practitioner, Jim White: Consultant, Paul Fallaw: Auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details) RESPONSE: InLine is a Pet Food Premix manufacturing facility that is located in an industrial area in Pratt, Kansas. The company has been in the Pet Food Premix business for seven years and at the particular location being audited for five years. The facility operates five days a week, eight hours a day. There is one shift at the facility that runs from 7 am to 11 am, 12 pm to 4 pm, etc. etc. There are six total employees at the site with six employees on the main shift. InLine receives raw ingredients and packaging material from select vendors that are all stored at ambient temperature. Ingredients are weighed up by hand measure, micro scale, bulk weight and hand dump, then sent through our closed drag system to our two-ton mixer, each batch completes at either an IBC bulk bag or a 50lb bag with finished product filled with Dog or Cat Vitamin or Mineral Premix. Production areas at the facility encompass approximately 14,539.5 square feet, and include three rooms. Warehousing at the main Plant encompass approximately Production 8874 square feet, Receiving Warehouse 1863 square feet and Finished Product Warehouse 3802.5 square feet, and are made up ambient storage. Overflow Ingredient storage is made up of 6840 square feet of ambient storage in the separate warehouse to the west of the plant. The remainder is office and ancillary areas. InLine takes dry ingredients, vitamins and minerals and carrier oil to produce a Pet Food Premix Mash that goes onto our customer for further processing to create dog and cat food. Products manufactured and/or handled at this facility are distributed in the United States. Location: 304 Pedigo Drive and overflow warehouse on the corner of Walnut and Pedigo Scope Statement: Manufacture Pet Food Premix mash Exemptions: None
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Sheldon Reiff: General Manager, John Ford: Interim Plant Manager (PCQI), Courtney Duffy: Director QC, Jennifer Schmidt: SQF Practitioner, Jim White: Consultant, Paul Fallaw: Auditor
Auditor Recommendation	Auditor Recommendation RESPONSE: Proceed to certification once all non-conformances have been addressed.

Section Responses

2.1.1 Management Responsibility (Mandatory)

A Food Safety Commitment Policy (Doc. No. 1 Food Safety Commitment Policy dated 07/12/2022) is in place, signed by the management team and is displayed in the main lobby. The management team leads a Food Safety Culture through example and training. In addition, the facility has developed a FSC Questionnaire that all employees are required to complete. Observations and interviews with employees indicate that they are trained and held accountable for food safety and regulatory requirements, encouraged and required to notify management about actual or potential food safety issues and/or are empowered to act and resolve any issues that may fall within their job responsibility. The site has also developed several Food Safety and regulatory goals that they are hoping to achieve: (1) meet or exceed food safety and legislative requirements established by FSMA, (2) Maintain a passing SQF score, and (3) No Product Withdrawals or Recalls. An organizational chart (Doc. 3 Reporting Structure Rev. 8 dated 07/12/2022) is in place along with job descriptions which include designated back-ups. Reviewed job descriptions for all members of the Management staff and employees. Reviewed Doc. 5 Job Descriptions Rev. 4 dated 07/12/2022 and Doc. 4 Primary and Substitute SQF Practitioner Qualification Rev. 3 dated 06/29/2022. A SQF Practitioner and back-up SQF Practitioner have been assigned. Reviewed training certificates: SQF Practitioner-FS(CA Preventive Controls for Animal Food dated 09/03/2021). The facility understands the blackout periods that would occur during an unannounced audit.

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 pet 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 pet food. The policy statement shall be: i. Signed by the senior site manager and displayed in prominent positions; and ii. Effectively communicated to all site personnel in language(s) understood by all site personnel.

RESPONSE: COMPLIANT

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and held accountable for their food safety and regulatory responsibilities; v. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vi. Staff are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: 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 backup for absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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 element 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of pet food products.

RESPONSE: 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.

RESPONSE: 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.

RESPONSE: COMPLIANT

2.1.2 Management Review (Mandatory)

Per Doc. 6 Management Review Rev. 3 dated 05/17/2022, the SQF system is reviewed on an annual basis by senior management. The annual review occurred on 07/05-06/2022. In addition, the SQF Practitioner updates the senior management team on a monthly basis. Reviewed monthly meeting notes dated 05/26/2022, 06/15/2022, and 07/29/2022.

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 review. Records of all management reviews and updates shall be maintained.

RESPONSE: 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.

RESPONSE: COMPLIANT

2.1.3 Complaint Management (Mandatory)

A Complaint Management Program (Doc. No.8 Complaint Management Rev.3 dated 05/17/2022, Doc. 9 SOP Complaint Management Rev. 3 dated 05/17/2022 and Doc No. Form Complaint Management Rev. 1 dated 05/17/2022) is in place. The Purchaser and Nutritionist receive complaints which are then forwarded to the Quality and Operation Manager who conducts root cause analysis and investigations. There has not been any customer complaints for 2022.

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

RESPONSE: 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.

RESPONSE: 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 maintained.

RESPONSE: COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

A food safety manual has been developed and maintained in both hard and electronic forms. It is maintained by the Director of Quality, Quality Manager and consulting firm and contains the scope of the certification, a list of products in the scope, organizational charts and food safety policies, programs and procedures that make up the site's SQF system.

2.2.1.1 The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Pet Food Manufacturing shall be maintained in electronic and/or hard copy documentation. It 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 to the country of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, pre-requisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development and the implementation, maintenance, and control of the SQF System.

RESPONSE: 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 pet food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

A Document Control Program is in place. Reviewed Doc. No. 15 Document Control Rev. 3 dated 05/17/2022 and Doc. No. 16 SOP Document Control Rev. 3 dated 05/17/2022. All documents contain a header format that includes Document number, Name, Version number, Implementation date, revised date and approval signatures. In addition, a history revision is imbedded in each document. Reviewed Doc. 17 SQF Document Register Rev. 23 dated 08/10/2022.

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

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

A Record Retention procedure is in place. Reviewed Doc. 18 Records Rev. 3 dated 05/17/2022 and Doc. 20 SOP Records Rev. 2 dated 05/17/2022. A review of records throughout the audit and facility walk-through showed that they are readily accessible, legible and that tasks are being performed in an effective manner. All records would be retained for a minimum of five (5) years which exceeds the shelf life of their products (6 months).

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

RESPONSE: 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.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.1 Product Formulation and Realization

A Product Development Program is in place and managed by the Director of R&D. Reviewed Doc. 20 Product Formulation and Realization Rev. 3 dated 05/18/2022 and Doc. 21 SOP Product Formulation and Realization Rev. 3 dated 05/17/2022. The Nutritionist develops all products while the Plant Manager would develop the corresponding Finished Product Specification. All new products would undergo the necessary site trials and product testing including shelf life studies and HACCP review prior to final commercialization. The facility has not developed or launched any new products in 2022.

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

RESPONSE: COMPLIANT

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, including minimum and maximum nutrient and medicinal values (e.g. vitamin D, thiamine, life stages, species, animal size, and or breeds). Where necessary shelf life trials shall be conducted to establish and validate a new product's: i. Preparation, handling, and storage requirements including the establishment of "best before dates"; and ii. Microbiological criteria.

RESPONSE: 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.

RESPONSE: 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.

RESPONSE: COMPLIANT

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

RESPONSE: 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.

RESPONSE: COMPLIANT

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

Specifications for all raw materials, ingredients, additives, chemicals, processing aids and packaging are on file and current. Reviewed Doc. 23 SOP Specifications (Raw Materials, Packaging, Finished Products and Services) Rev. 3 dated 05/18/2022. Reviewed several specifications for raw and packaging materials. All raw materials require a Certificate of Analysis (COA) and all packaging components that come in direct contact with foods are required to have a Letter of Guarantee and Certificate of Conformance (COC) to ensure that they meet all regulatory guidelines. The facility acts as a contract manufacturer. Finished product labels are accurate and comply with relevant legislation and are supplied by the customer. Reviewed labels and Finished Product Specifications for MPF Cat Fry Customer Micro Premix and MPF Custom Whole Earth Farms Dof Premix. Doc. No 26 Register Contract Service Specification Rev. 3 dated 06/07/2022 is in place and includes a complete description of the services and training that any third party contract service provider must obtain prior to being employed and/or entering the facility. Reviewed Doc. No. 24 Register Raw and Packaging Materials Rev. 0 dated 05/26/2020 and Contract Service Provider Register. Since this is a stand alone facility, element 2.3.2.3 is NA. Minor-2.3.2.10 The Contract Service Provider List was not current and up-to date at the time of the audit.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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 of destination, if known.

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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, tolerance levels, and/or other parameters that may be variable by crop or by season).

RESPONSE: COMPLIANT

2.3.2.6 Verification of packaging shall include: i. Certification that all packaging that comes into direct contact with pet 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. ii. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses shall be conducted and records maintained to confirm the absence of potential chemical migration from the packaging to the pet food contents.

RESPONSE: COMPLIANT

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

RESPONSE: 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 service to be provided, and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

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

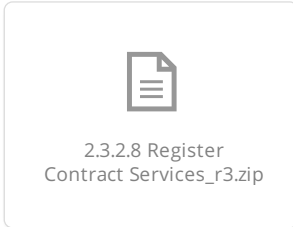
RESPONSE: COMPLIANT

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

RESPONSE: MINOR

EVIDENCE: The Contract Service Provider List was not current and up-to date at the time of the audit.

ROOT CAUSE: SQF Audit finding failure to add ServiTech to the initial Approved Contractors List as well as failure to catch it in the 2022 review.



CORRECTIVE ACTION: Added Servi-Tech to the Approved Contractors List. SQF Practitioner now has a hard copy list of all Approved Contractors on her desk as a reminder and added the review and maintenance of this document annually to the Validation and Verification Schedule.



VERIFICATION OF CLOSEOUT: Reviewed the revised Contract Service Provider List that addressed the non-conformance. Approved. Paul Fallaw

COMPLETION DATE: 08/18/2022 **CLOSEOUT DATE:** 09/11/2022

2.3.3 Contract Manufacturers

The facility does not utilize the services of contract manufacturers; and therefore, this section is NA.

2.3.3.1 The methods and responsibility for ensuring all agreements relating to pet food safety and customer product requirements, their realization, and delivery are specified and agreed shall be documented and implemented.

RESPONSE: NOT APPLICABLE

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 to the SQF Food Safety Code: Pet 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: Pet Food Manufacturing or other GFSI-benchmarked certification program and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

2.3.3.3 Contractual agreements with third-party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with the SQF Food Safety Code: Pet 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 that customer and regulatory requirements are being met at all times.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

2.3.4 Approved Supplier Program (Mandatory)

Doc. No. 45 Approved Supplier Program Rev. 3 dated 06/07/2022 is in place and outlines the responsibility and procedures for selecting, evaluating, approving, and monitoring approved suppliers. Reviewed Approved Supplier Register (Doc. 47 Register of Approved Suppliers Rev. 1 dated 08/28/2020) that includes all supplier contact information. All approved suppliers are required to submit specifications, regulatory documents, Letters of guarantee (where applicable), or undergo third party audits/certifications (depending upon risk), and Certificates of Analysis (COAs) or Certificates of Compliance (CoCs). The receipt of raw materials, ingredients and packaging from nonapproved suppliers is addressed and imbedded within the program. All incoming raw materials would be required to submit a Certificate of Analysis (COA) and would be placed ON HOLD and approved prior to use. Packaging material suppliers are required to submit an annual Letter of Guarantee. This is a stand alone facility, and therefore, the site would not bring any materials in from another corporate location. A majority of the raw materials are requested/required by their customers, however, the facility does purchase several raw materials on their own, All suppliers are considered to be low risk.

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

RESPONSE: COMPLIANT

- 2.3.4.2** The approved supplier program shall be based on the prior 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 a raw material, ingredients, packaging, services and the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: 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 receipt inspections as all other material providers.

RESPONSE: COMPLIANT

- 2.3.4.6** Supplier audits shall be based on risk (as determined in 2.3.4.1) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

Doc. No. 40 Food Legislation Rev. 2 dated 05/26/2021 outlines the site's assurance that all products manufactured will comply with all food safety legislation. The facility only manufactures products for domestic sales. The Nutritionist is responsible for ensuring the site is kept informed of changes to relevant legislation (FDA), scientific and technical developments, emerging food safety issues, and relevant industry codes of practices. The site has a written provision (imbedded within their Recall Program) that Bureau Veritas (the certification body), and SQFI will be notified within 24 hours if a food safety event requiring public notification occurs.

- 2.4.1.1** The site shall ensure that, at the time of delivery to its customer, the pet food supplied shall comply with the legislation that applies to the pet food and its production in the country of manufacturer and the country of use or sale (if known). This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, labelling, nutritional requirements for the animal species, feeding guidance, the life stage and any other criteria listed under pet food legislation, and to relevant established industry codes of practice.

RESPONSE: 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.

RESPONSE: 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 by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.4.2 Good Manufacturing Practices (Mandatory)

The property, buildings and equipment are located, constructed and designed to ensure food is manufactured in a safe, hygienic environment. The site has written and implemented those Good Manufacturing Practices (Doc. No. 41 Good Manufacturing Practices Rev. 2 dated 03/26/2021) applicable to the scope of this certification. These food safety pre-requisite programs are found in the Food Safety Plan. The effectiveness of the pre-requisite programs has been verified based on a schedule, which is found in the validation and verification schedule. There are no exemptions.

2.4.2.1 The site shall ensure the applicable Good Manufacturing Practices described in Module 4 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 to ensure that food safety is not compromised.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.3 Food Safety Plan (Mandatory)

A Food Safety Plan (Doc. No. 42 Food Safety Plan Rev. 7 dated 07/12/2022) has been developed in accordance with the twelve (12) steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained and consists of the following individuals: Plant Manager (PCQI), Procurement Coordinator, Plant Supervisor, and SQF Consultant. The HACCP Plans include a list of all products in the scope of the certification, a complete product description, intended product use and flow diagrams (dated 07/12/2022) for each process including all input and output steps in the process. A Hazard analysis has been conducted. At this time, based on the hazardous analysis, the facility has determined that there are no CCPs. The program was last reviewed on 07/12/2022. Observations and interviews with employees demonstrated that the program is effective.

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 outline the means by which the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

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 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. In the event external sources are used, the overall responsibility of the HACCP food safety plan shall remain with on-site personnel.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.3.4 Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. This 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, and/or composition.

RESPONSE: COMPLIANT

2.4.3.5 The intended use and reasonably foreseeable unintended use of each product shall be determined and documented by the food safety team. This shall include target pet groups, life stage, and level of activity, requirements for further processing if applicable, and potential alternative use of the product.

RESPONSE: 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 material, packaging material, service inputs (e.g. water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.
- RESPONSE: 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.
- RESPONSE: COMPLIANT**
- 2.4.3.8** The food safety team shall conduct a hazard analysis for every identified hazard to identify which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.
- RESPONSE: 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.
- RESPONSE: COMPLIANT**
- 2.4.3.10** Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point, or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.
- RESPONSE: COMPLIANT**
- 2.4.3.11** For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated 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 2.5.1.1).
- RESPONSE: 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 testing, the sampling and test methods, and the test frequency.
- RESPONSE: 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.
- RESPONSE: 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.
- RESPONSE: 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).
- RESPONSE: COMPLIANT**
- 2.4.3.16** Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.
- RESPONSE: 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.
- RESPONSE: COMPLIANT**

2.4.4 Product Sampling, Inspection and Analysis

Doc. No. 64 Product Sampling, Inspection, and Analysis Rev. 2 dated 03/26/2021 and Doc. No 65 SOP Sampling Finished Products dated 04/09/2021, outline the methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress and finished products. The facility inspects every 5 samples per Lot. In addition, Finished products (one cat and one dog product) are analyzed quarterly for Vitamin mixtures. Retention samples are stored according to regular storage conditions and maintained for the shelf life of the product (1 year). The facility does not have any internal laboratories or conduct any chemical or microbiological analyses on-site; and therefore, elements 2.4.4.3 and 2.4.4.4 are NA. Reviewed all outside third party laboratories ISO17025 Certificates. Reviewed quarterly test results. All results were within specification.

- 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 specification and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

RESPONSE: COMPLIANT

- 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 analysis, 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 equivalent international standard and included on the site's contract service specifications list (refer to 2.3.2.8).

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

- 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 pet food waste. Laboratory waste outlets shall at a minimum be down stream of drains that service pet food processing and handling areas.

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.5 Non-conforming Materials and Product

A Non-conforming Materials and Product procedure is in place. Reviewed Doc. No. 48 Non-Conforming Materials and Products Rev. 2 dated 03/26/2021 and Doc. 49 SOP Non-Conforming Material and Product Rev. 2 dated 07/13/2021. All non-conforming product is placed on HOLD, adequately tagged with stickers and quarantined in a segregated area of the warehouse. All products placed ON HOLD are placed into a HOLD Log. Reviewed Corrective and Preventive Actions Log Doc. 63 Rev. 0 dated 06/02/2020 and NCR 22052601 and 22011201.

- 2.4.5.1** The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, or packaging detected during receipt, storage, processing, handling, or delivery is handled 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 staff are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.6 Product Rework

A Rework procedure is in place. Reviewed Doc. 50 Product Rework Rev. 2 dated 03/26/2021 and Doc. 51 SOP Product Rework Rev. 1 dated 04/01/2021. The Nutritionist is required to submit a new formula that would include the correct amount of rework that must be used.

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

RESPONSE: COMPLIANT

2.4.7 Product Release (Mandatory)

Doc. No. 52 Product Release Rev. 2 dated 03/26/2021 and Doc. 53 SOP Product Release Rev. 1 dated 04/09/2021 outlines the responsibility and methods for releasing products. The Quality Assurance department and warehouse personnel are responsible for releasing products once all Processing paperwork has been reviewed and approved. The facility does not use a positive release program for finished product and does not test for any microbiological and/or chemical attributes. No outside warehouse would be used.

- 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 release shall be maintained.

RESPONSE: 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 country of use or sale, if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabelled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

Based on the risk assessment conducted by the facility, no Environmental program is necessary at this time; and therefore, this section is NA.

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

2.5.1 Validation and Effectiveness (Mandatory)

Reviewed Doc. No. 57 SOP Validation and Effectiveness dated 04/09/2021. The SQF and GMP Programs are reviewed as part of their internal auditing program. The facility has no critical food safety limits per their Hazardous analysis and Food Safety program.

2.5.1.1 The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented, implemented, and effective. The methods applied shall ensure that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required result; 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 controls are still effective. Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

The site has established a verification schedule outlining the verification steps, procedures and responsibilities for each verification activity. The schedule is maintained by the Quality Assurance department. The procedures for verifying the SQF Program, Good Manufacturing Practices, and other food safety controls and regulatory compliance include utilizing authorized personnel to verify all monitoring activities. Records of verification of monitoring activities activity were reviewed via facility walkthrough, documented internal audits, review of production and sanitation records. Reviewed Doc. No. 60 SOP Verification Activities dated 04/09/2021 and Doc. No. 59 Validation and Verification schedule Rev. 2 dated 07/13/2021..

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

The methods and responsibilities outlining how corrective and preventive actions are determined, implemented and verified can be found in the following: Doc. 61 Corrective and Preventative Action Rev. 2 dated 03/26/2021 and Doc. 62 SOP Corrective and Preventive Action Rev. 2 dated 07/15/2021. Records of all investigations, root cause analysis, resolution of non-conformities, corrections, and the implementation of preventive actions are maintained. Reviewed Corrective Action Log.

2.5.3.1 The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.5.4 Internal Audits and Inspections (Mandatory)

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented in Doc. No. 67 Internal Audits and Inspections Rev. 1 dated 04/09/2021 . The facility conducts an annual audit of the SQF Program, monthly GMP audits, quarterly Glass and Brittle Plastics audits. In addition, the facility conducts daily inspections that are recorded on the Pre-Operational inspoections. All staff conducting internal audits have been trained in Internal Auditing techniques. Reviewed Internal Auditing Certificate dated 07/08/2022. Reviewed GMP Inspections conducted on 04/05/2022, 05/23/2022, and 06/21/2022. Reviewed CAPA Log.

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: Pet Food Manufacturing are audited as per the SQF audit checklist or similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

A policy defining how products are identified from receipt through production and shipping has been documented in Doc. No. 69 SOP Product Identification dated 10/13/2021. 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. Pre-Operations Start-up and Packaging Line Pre-Operations Start-up Checklists are in place. Reviewed Doc. No. 70 SOP Product Start-up and Changeover 02/26/2021. Observations, interviews and a review of records demonstrated that the program is effective.

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 labelled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.2 Product Trace (Mandatory)

The responsibility and methods used to trace products are outlined in Doc. No. 68 Product Identification dated 02/11/2022. A live traceability exercise was conducted as part of the audit on 5 tons IC 4630 Lot No. P222202-01. 100% Recovery in 1 hour. The trace exercise was conducted via a vertically integrated audit reviewing all documents and records associated with production run. i.e., Shipping Log, Purchase Order, Trailer Inspection, Product Release, Batch Summary-Formula (Recipes), Spec, Receiving Log, Trailer Inspection, and COA(s).

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 provides traceability at least one step back from the process to the manufacturing supplier; ii. Includes date of receipt of raw materials, pet food contact packaging and materials, and other inputs; iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

The site has a Recall Plan (Doc. 76 SOP Product Withdrawal and Recall Rev. 4 dated 07/16/2021) defining the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and includes the General Manager, SQF Consultant, Plant Manager, Nutritionist, Feed Safety, and Dir. of Quality Control. The Recall and Product Retrieval policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It includes contacting SQFI and the Certification Body, who must be notified within 24 hours in writing of any food safety event requiring public notification. Investigation into the root cause of any product recall, mock recall or product withdrawal, with actions taken, was observed to be documented. The program requires that the facility conduct one (1) mock recall exercise on an annual basis. Reviewed Mock Recall Exercise conducted 07/21/2022. 10 tons IC 4630 Lot No. P220104-01. The facility recovered 100% of the product in 1 hour.

2.6.3.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented including sources of legal, regulatory, and expert advice and essential traceability information; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

RESPONSE: COMPLIANT

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 one step back) and finished product (minimum one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.4 Crisis Management Planning

The site's written Crisis Management Plan, Doc. No. 13 Crisis Management Planning Rev. 3 dated 07/19/2022, is documented. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The Plant Manager has oversight of the Plan and a Crisis Management team (including the GM, Nutritionist, Operations Mgr., SQF Practitioner, and Plant Supervisor) has been identified and trained. The Plan includes responses to a business interruption, isolating and identifying affected product and a current crisis alert list. The plan was last tested on 07/22/2022.

2.6.4.1 A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

The facility has conducted a food defense risk assessment and developed a plan that is managed by the Food Defense Team (GM, Nutritionist, Operations Mgr., SQF Practitioner, and Plant Supervisor) and includes: the methods, responsibility, and criteria for preventing adulteration caused by deliberate acts of sabotage or terrorist-like incidents, methods implemented to ensure only authorized personnel have access to production equipment, vehicles, manufacturing, and storage areas through designated access points, protection of sensitive processing points from intentional adulteration, safe and secure storage of raw materials, ingredients, packaging, work-in-process and finished products and the control of the premises from contractors and visitors. The site has a contractor/visitor policy in place which includes being escorted at all times. Doors, trailers and other sensitive areas are locked and secured. Reviewed Doc. 78 SOP Food Defense Rev. 0 dated 03/26/2021. The plan is tested on an annual basis. Reviewed test conducted on 07/29/2022. Observations and interviews with employees indicate that training is effective.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.7.2 Food Fraud (Mandatory)

A Food Fraud program (Doc. 82 SOP Food Fraud Rev. 0 dated 05/26/2020 and Food Fraud Mitigation Plan Rev. 1 dated 07/19/2022) is in place which identifies the methods, responsibility, and criteria for identifying the site's vulnerability to food fraud. Reviewed Vulnerability Assessment that was completed as part of the site's Food Safety Plan. Approved Supplier Program, Formulations, COAs, CoCs, and Finished Product Specifications help mitigate risks.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.8.1 Allergen Management (Mandatory)

An Allergen Management program is in place and an allergen statement has been prepared. Reviewed Doc. 84 Allergen Management Rev. 2 dated 03/26/2021 along with the sites risk assessment. Since this is pet food, allergens are not required to be labeled.

2.8.1.1 The responsibility and methods used to control human allergens (per country regulation) 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 inputs and processing aids, including food grade lubricants, that contain food allergens, and ii. The hazards associated with allergens and their controls.

RESPONSE: COMPLIANT

2.8.1.2 Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contact have been identified.

RESPONSE: COMPLIANT

2.8.2 Label Claims

The facility does not make any claims regarding their products; and therefore, this section is NA.

- 2.8.2.1** For products that are marketed as having limited ingredients (e.g., grain free, poultry free, etc.) the site shall ensure that: i. Raw materials, ingredients, and packaging are validated to make such claims; ii. Product changeovers are validated and verified to ensure that the status of such claims is not compromised, and iii. The system is effectively communicated to all applicable staff.

RESPONSE: NOT APPLICABLE

2.9.1 Training Requirements

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system and includes General Orientation, On-the Job and Classroom Training. Reviewed Doc. 85 Training Requirements Rev. 2 dated 07/19/2022. The effectiveness of the facility's training program was evidenced by interviews with plant employees and observation.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.9.2 Training Program (Mandatory)

A Training program (Doc. 85 Training Requirements Rev. 2 dated 07/19/2022 and Doc. 86 Training Needs Analysis Rev. 0 dated 05/26/2020) is in place and covers: Job responsibilities, GMPs, SQF, Food Safety, HACCP, Food Defense, Food Fraud and Allergens. Training occurs during general orientation and on an annual or as needed basis. All training is verified via observations and tests. Training is conducted in English, a language understood by all employees and staff. Reviewed Training Matrix for all employees and staff for 2022. Observations and interviews demonstrated that the program is effective.

- 2.9.2.1** A training program shall be documented and implemented that outlines, at a minimum, the necessary competencies for specific duties and the training methods to be applied for 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 handling of pet food products and pet food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in pet food processes 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. Food defense and food fraud for all on-site staff; and viii. Tasks identified as critical to meeting effective implementation and maintenance of the SQF Code. The training program shall include provision for identifying and implementing the refresher training needs of the organization.

RESPONSE: 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 languages understood by staff.

RESPONSE: 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.

RESPONSE: COMPLIANT

4.1.1 Premises Location and Approval

The facility is located in a semi-rural area in Pratt, KS. There are no food safety risks associated with surrounding businesses. Licenses were current and up to date. Reviewed FDA Registration No. XXXXXX6586 expires 12/31/2022 and State of Kansas License-exp. 06/30/2023.

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

RESPONSE: COMPLIANT

4.1.2 Building Materials

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, partitions, ceilings, and doors are of durable construction. Overhead pipes, ducting, etc. are designed and constructed to help facilitate cleaning and prevent unintentional contamination. Stairs, catwalks and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces. The facility does not have any pipes carrying sanitary waste or wastewater located directly over product lines or storage areas; and therefore, clause 4.1.2.6 is NA. No observations were noted during the audit.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

- 4.1.2.3** Waste trap system shall be located away from any pet food handling area or entrance to the premises.

RESPONSE: COMPLIANT

- 4.1.2.4** 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 4.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of pet food debris.

RESPONSE: COMPLIANT

- 4.1.2.5** Ducting, conduit, and pipes that convey services such as steam, water, or air shall be designed and constructed to prevent the contamination of pet food, ingredients, and pet food contact surfaces and allow ease of cleaning.

RESPONSE: COMPLIANT

- 4.1.2.6** 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 pet food, materials, ingredients, and pet food contact surfaces, and shall allow ease of cleaning.

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

- 4.1.2.9** Stairs, catwalks, and platforms in pet food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, and with no open grates directly above exposed pet food contact surfaces. They shall be free from debris and maintained.

RESPONSE: COMPLIANT

4.1.3 Lighting and Light Fittings

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof.

- 4.1.3.1** Lighting in pet 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.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.1.4 Inspection / Quality Control Area

The facility does not conduct any on-line inspections; and therefore, this section is NA.

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

RESPONSE: NOT APPLICABLE

4.1.5 Dust, Insect, and Pest Proofing

All external windows, fans, and doors were effectively sealed when closed and offered a suitable barrier to prevent dust and/or pests. External doors (including dock doors) were installed with self-closing devices and dock doors were supplied with appropriate dock covers. Insect Light Traps (ILTS) and pheromone traps are properly located. Internal tinkats are in use and bait would only be used in the exterior bait stations. No observations were noted.

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

RESPONSE: COMPLIANT

4.1.5.2 External doors, including overhead dock doors in pet 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 or air-flow device; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

RESPONSE: COMPLIANT

4.1.5.3 Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas or processing areas where ingredients, packaging, and product are handled, processed, or exposed.

RESPONSE: COMPLIANT

4.1.6 Ventilation

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. There are no open cooking areas; and therefore, clause 4.1.6.3 is NA.

4.1.6.1 Adequate ventilation shall be provided in enclosed processing and pet food handling areas.

RESPONSE: COMPLIANT

4.1.6.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 4.2.5 to prevent unsanitary conditions.

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

4.1.6.4 Fans and exhaust vents shall be insect-proofed and located so as not to pose a contamination risk and be kept clean.

RESPONSE: COMPLIANT

4.1.7 Equipment and Utensils

Specifications for the site's equipment, utensils and protective clothing, and purchase procedures for equipment are in place and were seen to be appropriately implemented. Reviewed specifications for utensils (scoops and handles). Vehicles are designed and operated so that they do not pose a food safety risk. Reviewed forklift inspection records and annual emission testing conducted on 07/26/2022. All non-conforming equipment would be identified and removed from service. Non-conforming products would be placed ON HOLD and moved to the quarantine area of the warehouse. No observations were noted during the facility walkthrough.

4.1.7.1 Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

4.1.7.2 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.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.1.7.6 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 4.2.5.1. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

4.1.7.7 All equipment and utensils shall be cleaned after use (refer to 4.2.5.1) or at a set and validated frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.1.7.9 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.

RESPONSE: COMPLIANT

4.1.8 Grounds and Roadways

The grounds surrounding the main building are landscaped and well manicured. Path, roadways and loading/unloading areas are all paved. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program.

4.1.8.1 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 controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.1.8.3 Paths from amenities leading to site entrances shall be effectively sealed.

RESPONSE: COMPLIANT

4.2.1 Repairs and Maintenance

The site has a Maintenance Program, Doc. 108 Premises and Equipment Rev. 1 dated 04/16/2021, that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. There is a schedule of planned Preventive Maintenance, and PM tasks are documented manually. The facility only uses food grade lubricants within the facility. Supervisors and Production staff would be notified whenever maintenance or repairs are being conducted in the production and/or processing areas. No temporary repairs were noted or observed during the walkthrough. There was no paint noted in production areas. Reviewed Work Orders.

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

RESPONSE: COMPLIANT

4.2.1.2 Routine maintenance of plant and equipment in any pet food processing, handling, or storage area shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

RESPONSE: COMPLIANT

4.2.1.3 Failures of plant and equipment in any pet food processing, handling, or storage area shall be documented, reviewed and their repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

4.2.1.4 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage area.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.2.1.6 Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

4.2.1.7 Pet food contact equipment and equipment located over pet food contact equipment shall be lubricated with food grade lubricants, and its use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

4.2.1.8 Paint used in a pet food handling or contact zone shall be suitable for use, in good condition, and not used on any product contact surface.

RESPONSE: COMPLIANT

4.2.2 Maintenance Staff and Contractors

Maintenance personnel and/or contractors are trained in good manufacturing practices and food safety and all contractors must sign in as part of the Visitor program. Appropriate cleaning and pre-operational inspections are carried out before resumption of operations. No observations were noted during the audit.

4.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 4.3).

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.2.2.3 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 completed and a pre-operational inspection conducted prior to restarting site operations.

RESPONSE: COMPLIANT

4.2.3 Calibration

A policy, Doc. No. 111 SOP Calibration Rev. 1 dated 04/16/2021, defines the methods and responsibilities for calibrating measuring, testing and inspecting equipment, and has been implemented. The calibration schedule includes: Scales (semi-annual-04/15/2022), Flow meters (quarterly-internally), magnets(quarterly-internally-06/30/2022-07/13/2022), and magnet pull tests (06/12/2022). Reviewed all calibration records.

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

RESPONSE: COMPLIANT

4.2.3.2 Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

4.2.3.3 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturer's recommended schedule.

RESPONSE: COMPLIANT

4.2.3.4 Procedures shall be documented and implemented to address the resolution of potentially affected products should measuring, testing, and inspection equipment be found to be out of calibration state.

RESPONSE: COMPLIANT

4.2.3.5 Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment.

RESPONSE: COMPLIANT

4.2.3.6 A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

RESPONSE: COMPLIANT

4.2.4 Pest Prevention

A policy (Doc. 116 SOP Pest Prevention Rev. 0 dated 05/26/2020) defines the site's program for pest prevention and the appropriate follow up to pest prevention issues that may occur. The program was observed during the audit to be effectively implemented. The premises were free of waste and debris as observed during the interior and exterior tours. The facility uses a licensed outside third-party service provider to administer this program on a weekly basis using a scannable system and reports to the SQF Practitioner. Reviewed PCO Applicator License expires 12/31/2022 and PCO Maps. The program utilizes Tinkats (29); Bait Stations (10); and ILTs (6). Reviewed inspection records from June-July 2022. Reviewed quarterly trending reports for 2022. All pesticides would be brought in at the time of the service; and therefore, clause 4.2.4.5 is NA. An approved Material List is in place. Reviewed SDS Sheets for several pesticides and cross-referenced them with application records. No observations were noted during the audit.

4.2.4.1 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 on a site map the identification, location, number, and type of applied pest control/monitoring devices; vii. List the chemicals used. They 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 identify trends.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.2.4.3 Identified pest activity shall not present a risk of contamination to pet food products, raw materials, or packaging.

RESPONSE: COMPLIANT

4.2.4.4 Pet 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 investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

4.2.4.5 Pesticides shall be clearly labeled and stored per 4.6.4 if kept on-site.

RESPONSE: NOT APPLICABLE

4.2.4.6 No animals shall be permitted on-site in pet food handling or storage areas.

RESPONSE: COMPLIANT

4.2.5 Cleaning and Sanitation

The facility has a Sanitation program (Doc. No. 117 Cleaning and Sanitation Rev. 2 dated 04/29/2021) in place which includes a Master Sanitation schedule for weekly, monthly and annual tasks. Individual SSOPs have been written and developed which include: what is cleaned; how it is cleaned; when it is cleaned; verification and validation; chemicals used; and PPE equipment. Reviewed Approved Chemical List. Reviewed Automatic dispensing unit records for 06/21/2022 and 07/27/2022. Cleaning verification is completed visually using Pre-Operational Sanitation Checklist and Corrective Action Form that is completed by the Quality department. A verification schedule is included in the overall sanitation schedule for daily, weekly, monthly, quarterly, biannual and annual tasks. Reviewed records from June and July 2022. Reviewed individual cleaning SSOPs for: Doc. 118 dated 02/15/2021. Doc. 183 dated 02/15/2022. The facility does not have any CIP systems; and therefore, element 4.2.5.4 is NA.

4.2.5.1 The methods and responsibility for the effective cleaning of the pet food handling and processing equipment, 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 cleaning procedures for pet food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

4.2.5.2 Detergents and sanitizers shall be suitable for use in a pet 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 4.6.4 and are handled only by trained staff.

RESPONSE: COMPLIANT

4.2.5.3 Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

4.2.5.4 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 modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

RESPONSE: NOT APPLICABLE

4.2.5.5 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, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

4.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. These cleaning operations shall be controlled so as not to interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.1 Personnel Welfare

These items are included in the site's GMP program. Visitors and Contractors must sign in prior to entering the facility. No observations were noted during the audit.

4.3.1.1 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 pet food or enter storage areas where pet food is exposed. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing products or handling primary packaging or pet food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

4.3.2 Handwashing

Handwashing is addressed as part of the facility's GMP program. Hand wash basins are located at appropriate employee access points to processing/packaging 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. Signs are posted reminding employees to wash their hands before returning to work and at individual hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Employees were observed to wash their hands properly during the audit and to use proper glove procedures.

4.3.2.1 All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors: i. On entering pet food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

4.3.2.2 Handwash stations shall be provided adjacent to all personnel access points and in accessible locations throughout pet food handling and processing areas as required.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.3 Clothing and Personal Effects

A policy, based on a documented risk assessment (dated 05/26/2020), 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. Jewelry is included in the facility's GMP program. No observations were noted.

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

RESPONSE: COMPLIANT

4.3.3.2 Clothing worn by staff engaged in handling pet food shall be maintained, stored, laundered, and worn so as not to present a contamination risk to products.

RESPONSE: COMPLIANT

4.3.3.3 Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

4.3.3.4 Excessively soiled uniforms shall be changed or replaced where they present a product contamination risk.

RESPONSE: COMPLIANT

4.3.3.5 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 designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.4 Visitors

The site has a Visitor Sign In program in place. At sign in, all visitors must read the hygiene and food safety requirements before entering food processing or handling areas, and are 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.

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

RESPONSE: COMPLIANT

4.3.4.2 All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 4.3.3.8. All visitors shall wear suitable clothing and footwear when entering any pet food processing or handling area.

RESPONSE: COMPLIANT

4.3.4.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which pet food is handled or processed.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.5 Staff Amenities (change rooms, toilets, break rooms)

Staff amenities are included in the MSS program. A breakroom is provided away from the processing area and includes: appropriate lighting and ventilation, adequate tables and seating to accommodate employees and staff, equipped with a sink, refrigeration, microwave and kept clean and free of waste. Lockers and restrooms are also provided and meet all of the elements listed in the clauses. Sanitary drainage would be directed towards the city's sewage system. The facility is not considered to be a high risk area; and therefore, elements 4.3.5.3 and 4.3.5.5 are NA. There are no outside eating areas; and therefore, element 4.3.5.10 is NA. No observations were noted during the walkthrough.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

4.3.5.6 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and pet 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. Include an area inside or nearby for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.3.5.8 Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 4.3.2.3.

RESPONSE: COMPLIANT

4.3.5.9 Separate break rooms shall be provided away from pet food contact/handling zone. 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 them to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

4.3.5.10 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 introduction of contamination, including pests to the site.

RESPONSE: NOT APPLICABLE

4.4.1 Staff Engaged in Food Handling and Processing Operations

There were no observations of violations of these elements. The facility does not conduct sensory evaluations; and therefore, element 4.4.1.4 is NA. Via interview and observation the operators have been trained in food safety handling procedures.

4.4.1.1 All personnel engaged in any pet 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 shall 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.

RESPONSE: COMPLIANT

4.4.1.2 Personnel working in or visiting pet food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the pet food handling/contact zone, except as noted in element 4.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed pet 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 of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers and in designated areas away from raw materials, packaging, tools, or equipment storage.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.4.1.4 In circumstances where it is necessary to undertake sensory evaluations in a pet food handling/contact zone the site shall implement controls and procedures to ensure: i. Pet 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 separate from processing equipment.

RESPONSE: NOT APPLICABLE

4.5.1 Water Supply

The facility uses city water. There are check valves on all hoses and drains, and backflow prevention devices are in place and tested on an annual basis. Reviewed test results dated 08/08/2022. The facility does not use non-potable water or store water on-site; and therefore, clauses 4.5.1.5 and 4.5.1.6 are NA. The facility would not operate if the water supply is deemed to be contaminated or otherwise inappropriate for use.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.5.1.3 Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.5.1.5 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 back flow or back siphonage.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.5.2 Water Treatment

The facility does not treat their water; and therefore, this section is NA.

4.5.2.1 Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives an effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: NOT APPLICABLE

4.5.2.2 Water used as an ingredient in processing or in cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 4.5.2.1).

RESPONSE: NOT APPLICABLE

4.5.2.3 Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemical usage shall be monitored to ensure chemical residues are within acceptable limit. Records of testing results shall be kept.

RESPONSE: NOT APPLICABLE

4.5.3 Water Quality

The facility uses city water that has been tested for coliform, E. coli, and heavy metals on an annual basis. Reviewed water testing result dated 07/12/2022.

4.5.3.1 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 pet food; ii. Handwashing iii. To convey pet food; iv. As an ingredient or pet food processing aid; v. Cleaning pet food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with pet food or used to heat water that will come in contact with pet food.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.5.3.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

4.5.4 Ice Supply

The facility does not use ice; and therefore, this section is NA.

4.5.4.1 Ice provided for use during processing operations or as a processing aid or an ingredient shall comply with 4.5.3.1.

RESPONSE: NOT APPLICABLE

4.5.4.2 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 shall be tested as appropriate.

RESPONSE: NOT APPLICABLE

4.5.4.3 Ice rooms and receptacles shall be constructed of materials as outlined in element 4.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

RESPONSE: NOT APPLICABLE

4.5.5 Air and Other Gasses

Compressed air is used in the facility and tested on an annual basis. Reviewed test results.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.1 Receipt, Storage and Handling of Goods

The methods for storage are documented in Doc. No. 136 SOP Inventory Management Rev. 0 dated 05/26/2020. The facility utilizes a first in first out (FIFO) program to ensure proper rotation of raw materials and finished goods. There were no observations of materials past use by dates or expiration. No temporary or overflow conditions occur at this facility; and therefore, clauses 4.6.1.5 and 4.6.1.6 are NA.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.1.3 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.1.5 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 is no risk to the integrity of those goods and no contamination or adverse effect on food safety.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.6.2 Cold Storage, Freezing, and Chilling of Pet Food

All product is manufactured and stored under ambient conditions; and therefore, this section is NA.

4.6.2.1 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 pet food and easily accessible for inspection and cleaning.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.6.2.4 Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

RESPONSE: NOT APPLICABLE

4.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

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. No observations were noted.

4.6.3.1 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 to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

4.6.3.2 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 predetermined frequency.

RESPONSE: COMPLIANT

4.6.4 Storage of Hazardous Chemicals and Toxic Substances

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, MSDS Safety manual, an up-to-date inventory and usage report of all chemicals, and available first aid and spill containment equipment. Reviewed Doc. 213 Register Hazardous Chemicals and Toxic Chemicals. No observations were noted during the audit.

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

RESPONSE: COMPLIANT

4.6.4.2 Storage of hazardous chemicals and toxic substances shall be: i. 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 separate from sanitizers and detergents; and vi. In a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.4.4 Daily supplies of chemicals used for continuous sanitizing of water or as a processing aid, or for emergency cleaning of pet food processing equipment or surfaces in pet 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 authorized personnel.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.4.7 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 spillage kits and cleaning equipment

RESPONSE: COMPLIANT

4.6.5 Loading, Transport, and Unloading Practices

Reviewed Doc. 140 Loading, Transport, and Unloading Practices Rev. 1 dated 04/16/2021, Doc. 141 SOP Receiving Rev. 1 dated 08/11/2021, and Doc. 142 SOP Loading and Transport Rev. 0 dated 05/26/2020. The practices applied during loading, unloading and transport are documented, implemented and designed to maintain appropriate storage conditions, product integrity and prevent cross-contamination. A trailer inspection program is in place. Reviewed Trailer Inspection records. Loading and unloading docks are designed to protect the product at all times. All full load trailers are locked and sealed prior to arriving/departing from the facility. Reviewed documented seal numbers on BOLs. All products are ambient; and therefore, clauses 4.6.5.5, 4.6.5.6, and 4.6.5.7 are NA. No observations were noted.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.6.5.3 Vehicles (e.g., trucks, vans, containers) shall be secured from tampering, using a seal or other agreed-upon and acceptable device or system.

RESPONSE: COMPLIANT

4.6.5.4 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 the product and package integrity during loading and transport.

RESPONSE: COMPLIANT

4.6.5.5 Refrigerated units shall maintain the product at the required temperature and 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 appropriate.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.6.5.7 On arrival, prior to opening the doors, the pet 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 commencement of unloading and at regular intervals during unloading.

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

4.7.1 High-Risk Processes

The facility would not be considered to be high risk; and therefore, this section is NA.

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.7.1.4 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 don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination.

RESPONSE: NOT APPLICABLE

4.7.1.5 Product transfer points shall be located and designed so as not to compromise high-risk segregation and to minimize the risk of cross-contamination.

RESPONSE: NOT APPLICABLE

4.7.2 Thawing of Pet Food

The facility does not thaw any products; and therefore, this section is NA.

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.7.2.3 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.

RESPONSE: NOT APPLICABLE

4.7.3 Control of Foreign Matter Contamination

Doc. 151 Control of Foreign Matter Contamination Rev. 1 dated 04/16/2021 and Doc. 152 SOP Foreign Matter Contamination Rev. 2 dated 08/10/2022 outlines 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. Reviewed Glass and Brittle Plastic Policy. 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 at the time of the audit and glass inspections are conducted on a quarterly basis as part of their internal auditing program. Knives and cutting instruments used in processing and packaging operations are controlled. wooden pallets would be inspected at the time of receiving. There are no glass instrument dial covers on processing equipment; and therefore, clause 4.7.3.4 is NA. No observations were noted during the audit.

- 4.7.3.1** 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, equipment has not become detached or deteriorated, and is free from potential contaminants.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.7.4 Detection of Foreign Objects

The facility utilizes magnets to prevent foreign material contamination. Reviewed Doc. 175 SOP Magnet Rev. 2 dated 10/11/2021. The facility does not have an metal detectors in place; and therefore, clause 4.7.4.3 and 4.7.4.4 are NA.

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

RESPONSE: COMPLIANT

4.7.4.2 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 the location of the detector in the process.

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT

4.8.1 Waste Disposal

A policy (Doc. 156 Waste Disposal Rev. 2 dated 04/16/2021) defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas on the interior and exterior of the facility were observed to be well-maintained and clean. The daily cleaning sign off sheet includes daily monitoring of waste. There are no trademarked materials; and therefore, element 4.8.1.6 is NA. The facility does not generate any inedible waste for animal feed; and therefore, elements 4.8.1.7 and 4.8.1.8 are NA. The facility does not generate any liquid waste; and therefore, clauses 4.8.1.3 and 4.8.1.9 are NA. No observations were noted.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

4.8.1.4 Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly so as not to attract pests and other vermin.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

4.8.1.6 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.

RESPONSE: NOT APPLICABLE

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

RESPONSE: NOT APPLICABLE

4.8.1.8 Waste held on-site prior to disposal shall be stored in a separate storage facility and suitably insect proofed and contained so as not to present a hazard.

RESPONSE: NOT APPLICABLE

4.8.1.9 Adequate provision shall be made for the disposal of all liquid waste from processing and pet food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.

RESPONSE: NOT APPLICABLE

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

RESPONSE: COMPLIANT