NSF International

Supplier Assurance Audit - Distribution

Company Information		Audit Information	
Facility:	C0052656 - Keele Warehousing & Logistics	**Audit# - Visit#:**	2843006 - 2309287
Address:	90 Summerlea Road Brampton , Ontario Canada, L6T 4X3	**Audit Type:**	SADCPR - Supplier Assurance Audit - Distribution
		Template Version:	1.4
Contact:	Mr. James Appelbe	**Audit Category:**	REGULAR
Title:	President	**Auditor:**	Norela Avila
Phone:	416-937-8006	**Audit Start Time:**	03-MAR-2022 07:55:00 AM
Fax:	416-244-8201	**Audit End Time:**	03-MAR-2022 04:55:00 PM
Email:	james@keelewarehousing.com	**Prior Audit Date:**	28-JAN-21

Explanation of Section Scorings (below)

Section scorings in the below table are provided as a reference and are calculated on the following formula:

Non-Conformance	Deduction of 5% per finding
Major Non-Conformance	Deduction of 25% per finding
Critical	0%

Summary By Section

Section Name	Non-Conformance	Major Non-Conformance	Critical	Score
Section A - Administration and Regulatory Compliance	1	0	0	95.00%
Section B - HACCP/Food Safety Plan	0	0	0	100.00%
Section C - Facilities and Equipment	1	0	0	95.00%
Section D - Cleaning, Sanitation, Housekeeping, Hygiene	0	0	0	100.00%
Section E - Rodent and Pest Control Management	0	0	0	100.00%
Section F - Approved Suppliers, Receiving and Inventory Control	0	0	0	100.00%
Section G - Training Requirements	0	0	0	100.00%
Section H - Food/Product Defense	0	0	0	100.00%

Explanation of Overall Audit Result (below)

The overall score result is based on the total number and level of non-conformances. The audit is allocated 100% and deductions made as follows:
Non-Conformance = 1% deduction per finding off the total score
Major Non-conformance = 10% deduction per finding off the total score
Critical Non-conformance = 25% deduction per finding off the total score

Scoring Guide

Final Audit Rating	Based on Score
Meets Expectations	100-95%
Needs Improvement	94.99-85%
Significant Improvement Needed	84.99-76%
Fail	≤ 75.99%

Overall Audit Result

Grade Rule Result	% Score
Meets Expectations	98.00%

Present at Audit					
Name	**Job Title**	**Opening Meeting**	**Site Inspection**	**Procedure Review**	**Closing Meeting**
James Appelbe;	President / Operations Manager	Yes	Yes	Yes	Yes
Maricel Ballore - Estrella	Office Administrator	Yes	No	Yes	No

GENERAL INFORMATION	
No	**Question/Notes**
1.1	**Facility and Operations Description.** Auditor's Notes: The site is an ambient storage warehouse of 100,000 sq. ft area located in prominent area of Brampton, Ontario. The facility provides services like storage and warehousing mainly to the food processors and food manufacturers. Approximately 20 employees working in the warehouse. The warehouse was cleaned , organized and well managed. The operations has two shifts operations start from 0700 hrs. to 1500 hrs. and second shift from 1530 hrs. to midnight. The main operational steps include receiving, storing, picking and shipping of the product.
1.2	**Regulatory Inspection Type and Establishment #:** Regulatory Inspections are not required for this operations.
1.3	**Products warehoused/produced at this facility.** Storage and Distribution
1.4	**The following departments and individuals participated in the audit process:** James Appelbe President, Maricel Ballore-Estrella Office Administrator
1.5	**Notes from Auditor** Site noted well maintained, with clear management commitment and employees engagement

Non-Compliance Summary		
No	**Question/Notes**	**Result**
Section A/ A.5.2	**Management responsible for crisis management shall conduct mock crisis exercises at minimum annually.** ***There is no mock crisis exercise conducted by the site.***	Non-Conformance*
Section C/ C.11.1	**There shall be a program to manage glass and brittle plastic.** ***During the audit was noted the forklift lights and controls no included during the site inspections.***	Non-Conformance*

Section A. Administration and Regulatory Compliance		
No	**Question/Notes**	**Result**
A.1.1	**There shall be a facility management organization chart indicating the reporting structure of the facility operating departments.** ***An organizational chart entitled "KWL Organizational chart" is documented, and it outlines the structure of staff having responsibilities for Operations and HACCP Management . The Chart was signed by President of company on 2021-01-19. The backup responsibilities were defined on the organizational chart. This is an ambient storage facility. The product is released by customer and site shipped the product as per customer requirements. The record of each shipment is maintained by site. The Management team was available during the audit.***	Acceptable
A.1.2	**There shall be implemented and documented policies and procedures that address relevant food safety, quality and security requirements for the receiving, handling, STORAGE and shipping of product.** ***A Quality System Management Master Manual has been developed, documented and maintained in hard copy. The manual contains all policies and procedures required for operations. The staff has access to Manual through their supervisors and managers. The staff is trained on policies on hire and during annual refresher trainings. QMS was reviewed on 2022-02-18.***	Acceptable
A.1.3	**There shall be management commitment and active support of the facility's food safety, quality and security systems.**** ***The site has written a Quality Statement. It was displayed at employee entrance on notice board. The president is fully aware and involved in day to day operation.***	Acceptable
A.2.1	**A file of regulatory audit visits and reports shall be maintained.**** ***There are no regulations required at site.***	N/A
A.2.2	**The facility shall have a documented process for the identification of regulations that are applicable to their specific ACTIVITIES. This process shall include identification of regulations for products in countries in which the facility's products are exported.**** ***There are no regulations required at site.***	N/A
A.3.1	**There shall be a documented, current and implemented facility specific Recall Plan.**** ***Site has documented and implemented policy entitled " Recall Plan". It contains the information and contact details of Recall Team. The information of appropriate regulatory contacts and customers was also available and observed current during the audit.***	Acceptable
A.3.2	**Recall management responsibility shall be assigned.** ***The recall team is defined and documented in "Recall Plan". Keele recall team list contains the Contact Person, Responsibilities, Alternate Contact details and Emergency Phone list.***	Acceptable
A.3.3	**Traceability Exercises shall be conducted at a minimum of twice annually.** ***Recall Plan of site outlines the requirement of conducting Mock Recall minimum three times per year. The records of the mock traceability exercise conducted on 2022-02-28 was reviewed and observed compliant with the requirements. The site was able to complete the exercises in less than 1 hour.***	Acceptable
A.3.4	**A documented management assessment shall be completed after each traceability exercise to evaluate the exercise for needed improvements and any corrective actions taken.** ***Effective Mock Recall Record is required to be completed by HACCP Coordinator after each traceability exercise. The record includes the Product Identification and Mass Balance. Record dated 2022-02-28 demonstrated site is able to achieve 100% recovery in less than 2 hours.***	Acceptable
A.3.5	**Essential There shall be evidence of traceability for all FOOD, and food contact packaging materials. shipping records shall be available.**** ***The site has implemented procedure to trace all product received and distributed. Lots from suppliers are maintained through the process.***	Acceptable
A.3.6	**The facility shall be able to successfully demonstrate the traceability system during the audit.**** ***During the audit trace exercise was completed in 7 min with 100% recovery for: item 36911 Quantity 1080 shipped 1031 in house 49 & item 30114 quantity 686 shipped 686.***	Acceptable
A.4.1	**The facility shall have a record retention and storage policy.** ***Standard Operating Procedure GMP-08/01 Control of Document and GMP-08/02 Control of Records outlines the requirements for controlling documents and records. As per company policies all records are retained by site for six fiscal years.***	Acceptable
A.4.2	**Essential Records relevant to FOOD SAFETY controls or evaluation of food safety, food quality and food defense shall be properly completed.**** ***The site is an ambient storage facility only for food products and non- food products. All records reviewed were genuine, legible and self explanatory.***	Acceptable
A.5.1	**Crisis management policies and procedures shall be developed to address any critical situations that may occur (e.g., product recalls and business continuity interruptions, such as natural disasters, catastrophic events and other emergency situations including, but not limited to, power outage, tampering)** ***The site's written Crisis and Natural Disaster Management Plan is found in document entitled GMP***	Acceptable

Section A. Administration and Regulatory Compliance		
No	**Question/Notes**	**Result**
	06.04 Continuity of Operations / Crisis Response Plan . The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The threats like Natural disasters, illness sewer / drain backup have been evaluated with mitigation plans in place. The crisis team training record was reviewed. Team contact information , emergency contacts and regulatory contacts were documented and found displayed on notice board.	
A.5.2	**Management responsible for crisis management shall conduct mock crisis exercises at minimum annually.** ***There is no mock crisis exercise conducted by the site.***	Non-Conformance*
A.6.1	**The facility shall manage customer AND/or consumer complaints.**** ***The site's written Complaint policy is found in the document GMP 12/01 Customer Communication and Feedback. It defines the methods and responsibilities for handling customer complaints and has been implemented. Site is a storage facility only. Most of the complaints are of service type such as short / over shipped, released wrong lot number, shipped extra pallet. The customer dictates all requirements for filling orders and shipping destination. To summarize customer, own the products all the time, site offer only rental storage services to the customers. The customer complaints 2021-15, 11 & 10 were reviewed during the audit and noted proper site RCA using fish bone tool.***	Acceptable

Section B. HACCP/Food Safety Plan		
No	**Question/Notes**	**Result**
B1.1	**A HACCP/FOOD SAFETY team shall be assembled with individuals having the appropriate product, process, and sanitation specific knowledge and expertise necessary for the development of an effective HACCP plan.** ***A multidisciplinary Food Safety Team has been identified and trained, with documentation found in HACCP & Food Defense Manual.***	Acceptable
B.1.2	**There shall be a written HACCP/FOOD SAFETY plan. The HACCP/FOOD SAFETY team shall participate in HACCP/FOOD SAFETY plan development and maintenance.** ***A HACCP Plan has been developed, implemented and maintained by the site. It is kept on file in HACCP Program and maintained by HACCP Coordinator. The HACCP Plan has been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines.***	Acceptable
B.1.3	**The HACCP Team shall construct a clear and easy to understand process flow diagram for each HACCP plan.** ***The HACCP team has developed flow diagrams for each process including all input and output steps in the process. The process flow has been verified and Approved by HACCP Team.***	Acceptable
B.1.4	**The Process Flow shall include PREVENTIVE CONTROLS AND CCPs IF APPROPRIATE, shall be current and shall be verified.** ***The flow diagram was current and steps were verified during the audit.***	Acceptable
B.2.1	**The HACCP team shall prepare a list of all of the hazards (chemical, physical, biological, radiological or other) for each type of product or product line that may be reasonably expected to occur at each step, from RECEIPT, storage, HANDLING and distribution until the point of consumption. Evaluation shall include all foods, food contact packaging materials, equipment and handling steps.**** ***A detailed HACCP Plan was documented. The HACCP Plan been prepared in accordance FSEP guidelines of CFIA. A multi-disciplinary HACCP Team has been identified and trained. The process flow has been verified by the President. The process flow diagram includes steps like receiving, storing , handling and shipping. The product descriptions, facility diagram, incoming material and hazard analysis is documented in HACCP Plan.***	Acceptable
B.3.1	**The HACCP team shall determine the Critical Control Points.**** ***The site is an ambient storage facility only for food products and non- food products. The Hazard Analysis includes hazards likely to occur and states the programs with control measures***	Acceptable
B.4.1	**Critical limits shall be specified and validated for each CCP.**** ***There are no CCP's***	N/A
B.5.1	**CCPs shall be monitored.** ***There are no CCP's***	N/A
B.5.2	**CCP monitoring records shall be maintained.** ***There are no CCP's***	N/A
B.6.1	**Essential Specific corrective actions to deal with deviations from established Critical Limits shall be in place for each CCP.**** ***There are no CCP's***	N/A
B.7.1	**There shall be written verification activities that confirm that the plan is being implemented as intended.** ***Quality Coordinator is responsible to conduct an annual verification of HACCP program. Verification was last done on 01/18/2021 with records reviewed during the audit indicate***	Acceptable

Section B. HACCP/Food Safety Plan		
No	**Question/Notes**	**Result**
	compliance.	
B.7.2	**There shall be documented validation of the effectiveness of the HACCP program.** ***HACCP program was verified and validated on an annual basis by HACCP Team with records available and reviewed during the audit.***	Acceptable
B.8.1	**There shall be documentation and record keeping that is appropriate to the nature and size of the operation.** ***Documentation and record are adequate for the operations. There were no CCPs.***	Acceptable

Section C. Facilities and Equipment		
No	**Question/Notes**	**Result**
C.1.1	**Essential The facility shall demonstrate that the water, ice and steam supply is potable and that potability is maintained at all times. Potability criteria for microbiological, chemical and physical parameters shall be used.**** ***The water is used for Cleaning floors , Hand washing and in the employee facility like washroom and lunchroom. Water is not used in the process. No test is required. A copy of municipal water testing report was in file and observed current during the audit.***	Acceptable
C2.1	**The exterior of the Facility is constructed and maintained to facilitate the HOLDING of wholesome product and that it at minimum meets the customer and regulatory food safety and quality requirements**** ***The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program.***	Acceptable
C.2.2	**Essential Facility construction and layout shall be such that product is adequately STORED, separated and protected from any operations that could cause contamination.**** ***The process flow was observed to be logical, with a continuous flow and designed to prevent cross contamination. It was observed during audit tours that the flow of employees is such that any cross contamination is minimal.***	Acceptable
C.3.1	**Facilities shall be designed and maintained in a suitable condition so as not to impede the ability to thoroughly clean all surfaces, provide pest harborage, or present opportunities for foreign material contamination.**** ***The pest control services is provided by approved service provider. Based on the risk of operations the Pest map is created, the exterior and interior traps are installed accordingly. The foreign material control program is documented and implemented by site. Employees are required to be trained on program during daily review meetings and at least once per year with annual refresher trainings.***	Acceptable
C.4.1	**Employee facilities shall be adequate in size, readily accessible, separate from food holding areas, and properly maintained.** ***Restrooms and washrooms were observed to be separate from Storage Areas. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis.***	Acceptable
C.5.1	**Hand wash requirement signs, in appropriate languages and/or graphics, shall be clearly posted at required locations and contain instructions as provided below.** ***Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands before entering to the storage warehouse.***	Acceptable
C.5.2	**Hand washing stations shall be adequate in location, suitably designed, operational and properly stocked.**** ***Hand wash basins are located in washrooms. 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 sanitizers were installed at different locations of warehouse. Employees were observed to wash and sanitize their hands properly during the audit***	Acceptable
C.6.1	**Essential ALL equipment shall meet sanitary design requirements and be maintained in such a manner as to permit proper operation and access for cleaning and inspection.**** ***There was no equipment installed at the facility. Site is storage and distribution center***	N/A
C.7.1	**Utensils, tools and containers are clearly identified and maintained in suitable condition.** ***There was no equipment installed at the facility. Site is storage and distribution center.***	N/A
C.8.1	**FACILITY lighting shall be suitable.** ***Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter proof.***	Acceptable
C.9.1	**Maintenance program and standards shall be in place.** ***Site has documented responsibilities, frequency and verification activities of cleaning and sanitation in SOP entitled GMP 03/01 Cleaning and Sanitation Program. A periodic and Maintenance Checklist is used by warehouse manager to record that daily, weekly, monthly, etc. cleaning has been done. Monthly inspection of warehouse is conducted by trained personnel.***	Acceptable

Section C. Facilities and Equipment		
No	**Question/Notes**	**Result**
	Records of monthly inspections were observed maintained during the audit.	
C.9.2	**Essential Equipment or control devices that impact on food safety and/or product compliance to quality and regulatory requirements are effectively calibrated.**** ***Site is an ambient storage and distribution facility. There were no equipment that required calibration.***	N/A
C.10.1	**Wood, where used, shall be controlled and inspected.** ***Wood pallets were clean and in good condition, and the facility. Monthly Inspection report is filled and reviewed from Jan 21 to Jan 22.***	Acceptable
C.11.1	**There shall be a program to manage glass and brittle plastic.** ***During the audit was noted the forklift lights and controls no included during the site inspections.***	Non-Conformance*

Section D. Cleaning, Sanitation, Housekeeping, Hygiene		
No	**Question/Notes**	**Result**
D.1.1	**There shall be a master cleaning and/or sanitation schedule and monitoring and recording of cleaning.**** ***Site has documented responsibilities, frequency and verification activities of cleaning and sanitation in SOP entitled GMP 03/01 Cleaning and Sanitation Program. A periodic and Maintenance Checklist is used by warehouse manager to record that daily, weekly, monthly, etc. cleaning has been done. Monthly inspection of warehouse is conducted by trained personnel. Records of monthly inspections were observed maintained during the audit.***	Acceptable
D.1.2	**There shall be standardized cleaning procedures (e.g., Standard Sanitation Operating Procedures or SSOPs).**** ***SOP entitled GMP 03/01 Cleaning and Sanitation Program is documented. The SOP consist of procedure and frequencies and responsibilities of performing periodic cleaning activities.***	Acceptable
D.1.3	**There shall be a documented pre-operational Inspection.** ***Site is not manufacturing. No processing occurs at facility. Pre-operational does not require to be conducted.***	N/A
D.1.4	**Operational Housekeeping shall be effective.** ***Facility was observed clean and organized. Landscaping was done at exterior of site.***	Acceptable
D.2.1	**The facility has a documented program for GDP and Personal Hygiene practices to which compliance is monitored and recorded.** ***Employees are prohibited from working in warehouse areas when suffering from infectious and communicable diseases or have exposed cuts, sores or lesions. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. Food is allowed only in lunchroom and office areas. Site has designated areas outside the facility for smoking. The smoking zone was observed cleaned during the audit.***	Acceptable
D.3.1	**GDP Self Inspections shall be completed.** ***Warehouse Inspections are done and records are maintained by site. Inspection records from 2021 inspections were reviewed and noted in compliance. No deviations.***	Acceptable
D.4.1	**ALL chemicals (including, but not limited to, those used for sanitation, maintenance, and pest control) shall be approved for use, securely stored, clearly identified and used only by trained persons.** ***No chemicals are used for cleaning. Racking is wiped by damp clothes.***	N/A

Section E. Rodent and Pest Control Management		
No	**Question/Notes**	**Result**
E.1.1	**There shall be a documented and specific pest control program.** ***A policy entitled GMP 04/01 Pest Control Program defines the methods and responsibilities for integrated pest management and has been effectively implemented.***	Acceptable
E.1.2	**Outside Premises Management shall minimize opportunity for pests.** ***During the audit were reviewed PCO records from exterior devices no high number of captures were noted no signs of pest harborage noted, on the east and west side of the warehouse were noted couple baits missing in order to meet the requirement, the day after the audit the site provide an evidence of the baits installed including PCO report and pictures.***	Acceptable
E.1.3	**Essential There shall be no evidence of infestation.**** ***There was no evidence of infestation noted during the audit.***	Acceptable
E.1.4	**Pest Control Devices shall be properly managed.** ***Map dated 2022-01-01 noted verified by the site, devices noted at correct location and inspected by the site by random every other week (only interior traps) and by service provider every month. Records reviewed during the audit from Jul, Sep, Dec, Jan 22 and Feb 22 demonstrated good control by the site no signs of contamination or open comments by the technician were noted.***	Acceptable
E.1.5	**Doors and windows shall be tight fitting and closed with openings sealed to prevent pest entry**	Acceptable

Section E. Rodent and Pest Control Management		
No	**Question/Notes**	**Result**
	into the building. ***Windows, doors and other openings are sealed to prevent any pest infestation or dust coming into the facility. Personnel access doors are self-closing and sealed to prevent any pest infestation. External doors and dock doors were sealed to prevent infestation.***	
E.1.6	**Pest control reports shall be maintained.** ***Monthly services provider reports and every other week records from site inspections were available and reviewed during the audit.***	Acceptable

Section F. Approved Suppliers, Receiving and Inventory Control		
No	**Question/Notes**	**Result**
F.1.1	**There shall be a documented approved supplier program. The program shall be based on risk assessment of the suppliers.**** ***The business does not require implementation of this procedures. Site is an ambient storage facility and offer storage services to manufacturer. List of customers of site was available during the audit, is maintained electronically at the S&R computer.***	N/A
F.1.2	**Suppliers shall be required to provide relevant documentation to support their status as an approved supplier.**** ***The business does not require implementation of this procedures. Site is an ambient storage facility and offer storage services to manufacturer.***	N/A
F.2.1	**There shall be a written procedure for the inspection of delivery vehicles. This shall apply to receiving and shipping. Procedures shall define when carriers are to be rejected.**** ***The methods and responsibilities of inspecting the incoming and outgoing was documented in policy entitled GMP 02/01 Receiving and Shipping Requirements. Incoming and outbound records were reviewed; records of vehicle inspection were documented. Inspection record dated 2022-01-01 -2022-02-22 were reviewed during the audit and noted in compliance.***	Acceptable
F.2.2	**There shall be a written procedure for the inspection and receipt of incoming materials.**** ***As per SOP Receiving procedure, all products are required to be inspected upon arrival. Any damage needs to be documented. Inspection record dated 2022-01-02 to 2022-02-22 were reviewed and noted in compliance.***	Acceptable
F.3.1	**Products shall be secure and protected in storage.**** ***Chemicals are stored separately from ingredients. All products are stored on pallets, 18" from the wall. Operation was very clean at time of the audit.***	Acceptable
F.3.2	**Storage temperatures shall be controlled and monitored.**** ***Facility provides only ambient storage services.***	N/A
F.3.3	**Inventory control shall be in place.** ***The traceability system observed very effective. The inventory is controlled through a inventory management software.***	Acceptable
F.4.1	**Essential All restricted or sensitive ingredients and potentially toxic chemicals shall be maintained under strict control and stored separately from food and food contact packaging to minimize the potential for accidental product contamination.**** ***Chemicals are stored away from the food products. Food Product are not opened at site. The facility is storage and distribution center of products that require ambient temperature.***	Acceptable
F.5.1	**There shall be policies and practices for the control of Retained and Returned Products.** ***Returns are inspected same as receiving products. Returned product is stored, shipped or disposed of as per customer written request.***	Acceptable

Section G. Training Requirements		
No	**Question/Notes**	**Result**
G.1.1	**New employee and temporary employees shall be trained in appropriate policies and procedures.**** ***Site has procedure to trained new hires. It is documented on policy entitled GMP 07/01 Training and Human Resource development. As per procedure all new hires are required to trained on policies, procedures and personnel practices during orientation. New hires are coached by seniority employee to ensure proper knowledge and skills are achieved before work along on the warehouse. Training records of new hires are maintained by site.***	Acceptable
G.1.2	**Training shall be conducted in the appropriate language(s).** ***The training language and materials are in English , the languages used in the operation and understood by all plant personnel.***	Acceptable
G.1.3	**Refresher Training shall be conducted.** ***Periodic refresh training needs have been identified by the training program. During the audit refresh training records for Emergency action plan dated 2022-01-24, Document signage dated 2021-02-23, loads and dispatch dated 2021-11-05, Trailer inspection dated 2021-01-22 were***	Acceptable

Section G. Training Requirements		
No	**Question/Notes**	**Result**
	reviewed and noted in compliance.	
G.1.4	**There shall be a method of assessment to determine proof of learning following training.** ***Assessment methods noted by quizzes and by observation. During the audit employee interview demonstrated a good understanding of site policies and procedures.***	Acceptable
G.1.5	**Training Records shall be maintained.** ***Training records are maintained and noted genuine and legible.***	Acceptable

Section H. Food/Product Defense		
No	**Question/Notes**	**Result**
H.1.1	**There shall be a written program which describes assigned responsibility for food/PRODUCT security and how it is maintained.** ***Site has documented and implemented a detailed policy entitled GMP 06/01 Food Defense Program. The food defense team was mentioned in policy and was observed current. The food defense team was trained.***	Acceptable
H.1.2	**Each facility shall conduct and document a food/PRODUCT defense risk evaluation to eliminate or significantly reduce the risk of external and internal intentional adulteration of food/PRODUCT (including food fraud).** ***A vulnerability assessment was also conducted and documented on Food Defense Program, dated 2022-02-18.***	Acceptable
H.1.3	**A comprehensive food/product defense plan shall be implemented to manage the risks identified in the evaluation.** ***The site has developed a Food Fraud Mitigation Plan to address the control of the identified food fraud vulnerabilities.***	Acceptable
H.1.4	**Employees shall be screened, trained in food/PRODUCT defense awareness and access to the facility shall be controlled.** ***Adequate training was noted during the employee interview performed during the audit, was evident knowledge on how food defense issues can be addressed and how to prevented.***	Acceptable
H.1.5	**Incoming and outgoing materials shall be protected and inspected.** ***All incoming and outgoing materials are inspected by authorized persons.***	Acceptable
H.1.6	**Facilitys shall be registered with the appropriate regulatory authority.** ***Registration with regulatory authority is not required for the operations.***	N/A