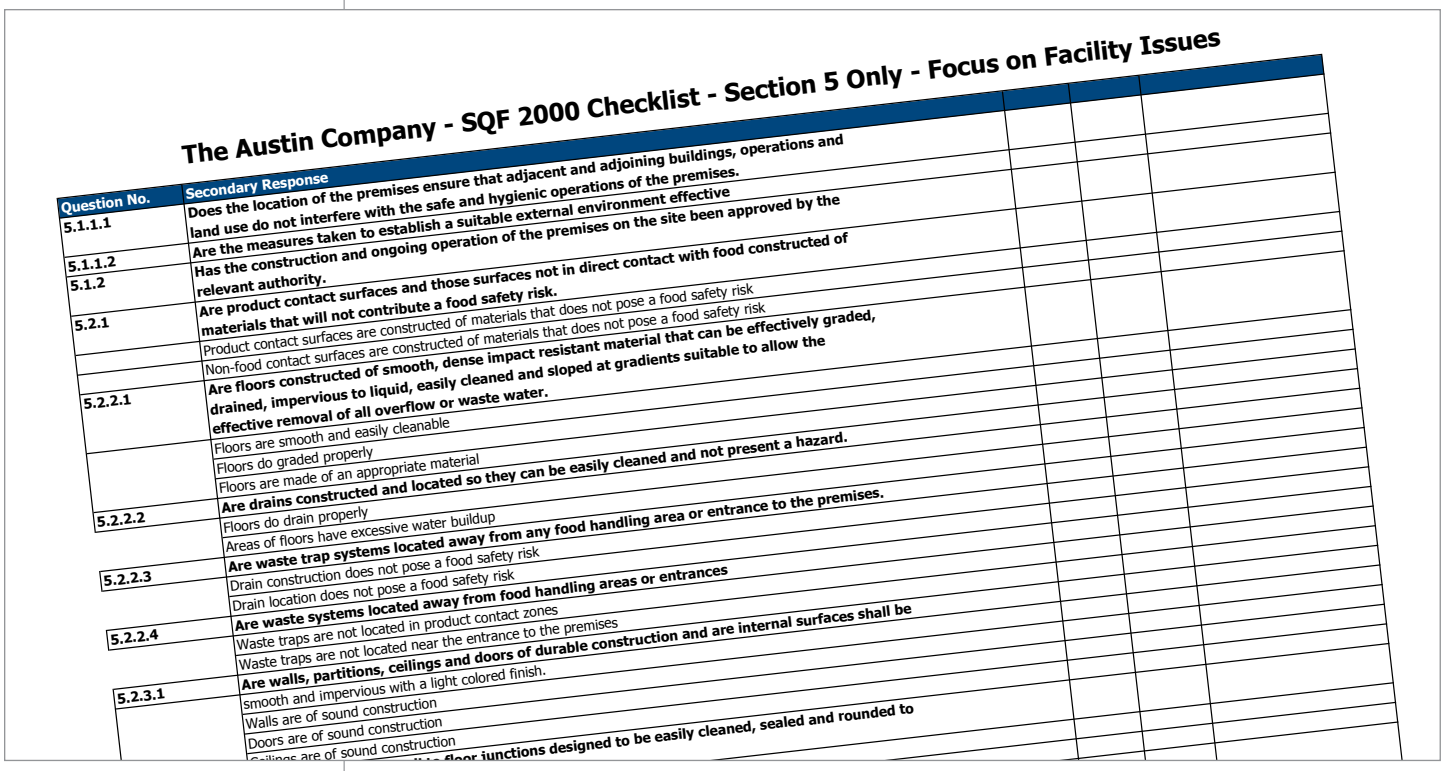
FOOD SAFETY & SECURITY
GETTING READY FOR CERTIFICATION



The Austin Company - SQF 2000 Checklist - Section 5 Only - Focus on Facility Issues

Question No.	Secondary Response
5.1.1.1	**Does the location of the premises ensure that adjacent and adjoining buildings, operations and land use do not interfere with the safe and hygienic operations of the premises.**
5.1.1.2	**Are the measures taken to establish a suitable external environment effective**
5.1.2	**Has the construction and ongoing operation of the premises on the site been approved by the relevant authority.**
5.2.1	**Are product contact surfaces and those surfaces not in direct contact with food constructed of materials that will not contribute a food safety risk.**
	Product contact surfaces are constructed of materials that does not pose a food safety risk
	Non-food contact surfaces are constructed of materials that does not pose a food safety risk
5.2.2.1	**Are floors constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid, easily cleaned and sloped at gradients suitable to allow the effective removal of all overflow or waste water.**
	Floors are smooth and easily cleanable
	Floors do graded properly
	Floors are made of an appropriate material
5.2.2.2	**Are drains constructed and located so they can be easily cleaned and not present a hazard.**
	Floors do drain properly
	Areas of floors have excessive water buildup
5.2.2.3	**Are waste trap systems located away from any food handling area or entrance to the premises.**
	Drain construction does not pose a food safety risk
	Drain location does not pose a food safety risk
5.2.2.4	**Are waste systems located away from food handling areas or entrances**
	Waste traps are not located in product contact zones
	Waste traps are not located near the entrance to the premises
5.2.3.1	**Are walls, partitions, ceilings and doors of durable construction and are internal surfaces shall be**
	smooth and impervious with a light colored finish.
	Walls are of sound construction
	Doors are of sound construction
	Ceilings are of sound construction
	floor junctions designed to be easily cleaned, sealed and rounded to

WHITEPAPER AND SQF 2000 CHECKLIST

THE AUSTIN COMPANY

Food Safety & Security
Getting Ready for Certification

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Introduction

The Food Industry is faced with a changing landscape and the rate of change is accelerating. What was good enough in the past is unlikely to be sufficient to meet the challenges of today and tomorrow in delivering a high quality, safe product to the consumer. Adapting to the changing landscape is a necessary and continuous obligation. Participating in one of the recognized Food Safety Certification programs can be a useful or necessary step in adapting to change.

Food Safety is driven by an evolving body of requirements imposed by the government, retailers, bodies devoted to developing new or expanded standards, and public outcry stimulated by the media. The US Congress is now deliberating the "Food Safety Enhancement Act of 2009" which will surely increase FDA's role in regulating and oversight. Whether the new legislation will reduce or expand the overlapping requirements of FDA and other regulators remains to be seen. It is safe to assume that this part of the equation will only become more complex.

The US Department of Homeland Security (DHS) has in place regulations to protect our sources of food supply from tampering, terrorists, and other such risks apart from pathogen-type Food Safety risks. At this time, meeting the Food Security requirements is not so disruptive for most processors. From this point forward, we think it is logical to combine these requirements and refer to them collectively as Food Safety & Security requirements.

Food Safety and Security is an Operational Issue. The buck stops at the packers or processors facility. No party remote from the plant can ensure that a safe product is consistently produced and is ready to ship. Inside the plant, self-monitoring and continuous improvements always have and always will be the cornerstone of Food Safety.

Food Safety and Security compliance requires a huge amount of support. If any of the following or other important support element is missing, the others are likely to carry a larger and inappropriate burden.

- Management Commitment
- Raw Material Quality Assurance
- Effective Sanitation & Maintenance Programs
- Effective employee training and re-training
- Effective controls (Risk Assessment, Traceability, TQM, HACCP, etc.)
- Packaging integrity and packaged product protection
- Employee screening (health, security, reliability)
- Reliable, appropriate, and efficient equipment
- Validated processes
- Good workflow, segregation of incompatible activities, access control
- Durable, hygienic, and appropriate facilities for processing and storage

Food Safety & Security
Getting Ready for Certification

Certification Programs have been developed to expand and formalize the oversight of the food chain from farm to table including special emphasis on food processing. These programs have noble goals, well thought out architecture, and the support of many. They depend on the auditing of operations by 3rd parties who themselves must achieve certification as auditors. The Global Food Safety Initiative (GFSI) recognizes the FMI sponsored SQF (Safe Quality Food) program as a globally trusted certification system for safety and quality active throughout the food chain. Some retailers are mandating participation by suppliers in this program and it is growing. Other organizations have been active in third-party auditing for many years such as AIB. These audits can be valuable under the best of circumstances (when performed by competent persons already familiar with the manufacturing technology and when follow-up on corrective actions is a part of the audit). Reading the March 5, 2009 New York Times article "The Trouble with Food Safety Audits" will expose the reader to documented weaknesses inherent in today's 3rd party auditing. The events leading up to the publishing of the article above have provided a powerful stimulus to the sponsors of Certification Programs to improve the efficacy of their auditing activities.

One of the most obvious problems with seeking Certification via third-party auditing is the lag time that is inevitable after a problem requiring corrective action is identified and a fix can be put in place, and Certification can be awarded. If capital monies are needed to perform corrective actions, the capital approval process in some companies takes longer than correcting the deficiency. Modern business practice abhors setting money aside for unquantified eventualities like flunking an audit, so going through the capital approval routine becomes necessary and time consuming. An alternate path to follow is to perform what we refer to below as a pre-audit which has the specific purpose of identifying capital expense or long lead deficiencies in advance of the formal audit to maximize the use of time available before the date that certification is needed.

Focus on the Facility (Process and Buildings)

The Austin Company has a long history of planning, designing, equipping, and constructing modern and effective facilities for the Food Industry. Our involvement in supporting Food Safety & Security through facility design has grown in pace with or slightly faster than the industry leader's awareness of its needs. We recognize our important supporting role in helping our clients achieve their Food Safety & Security goals through good plant and process design. Some key factors in our response include:

- Others are providing leadership and control of the HACCP program. We analyze the program documents and identify physical solutions which we offer to be incorporated in our plant and process design scope.
- We participate in Food Safety & Security risk analysis with our clients early in the planning phase of a project.
- We analyze food material, people, packaging material, and trash/by-product flows within the plant to develop schemes to avoid cross-contamination risks.

- We develop solutions to eliminate or reduce the volume of traffic in and out of sensitive areas such as RTE packaging.
- We research and recommend technology to be employed to monitor and report on Critical Control Points as well as establishing parameters for validation of critical processes where appropriate.
- We analyze the client's choice of chemicals and procedures for sanitation and then recommend durable materials of construction.
- We offer solutions to a wide variety of risks previously identified such as: insect infestation, rodent or bird control, disinfection and/or disposal of contaminated material, condensation, make-up air filtration, control of air flows, positive isolation of "dirty activities", access control to secure storage, etc.

Food Safety & Security – the Facility Planning Toolbox

We offer here several tools that you may use or that may stimulate you into customizing for your use. As it is a little risky to go into Certification Audits without some preparation, we recommend that you look over the following information with your situation in mind and make a quick assessment of what will be needed going forward.

Planning, Scoping, and Budgeting Remedial Actions

Introduction

A moment will come in pursuit of internal Food Safety standards or the quest for Certification when a deficiency is identified and a call to action results. Except when there is actually a recall, there should be some small amount of time for development of a sensible strategy to correct the deficiency. We will all agree that it is best to move with care initially to be sure that the plan of action is altogether prudent and has a high degree of probability for success.

Some deficiencies may be corrected by resources already in place such as:

- Development and execution of specific training modules
- Development of new record-keeping or data acquisition
- Development of new operating procedures
- Improvement of SSOP's
- Additional testing protocols
- Disqualification of suppliers of off-spec raw materials
- Transfer of at-risk production to sister plants or co-packers

Other deficiencies can only be corrected after capital expenditure requests and approval. Response time will be greater in this case even if approvals are rapidly forthcoming. This document intends to focus on this specific, capital intensive, situation

Strategy Development Step

The first step should be the rapid development of a sensible strategy. Some of the key components of this step are:

- Clearly describe the deficiency

- Who identified the deficiency and why?
- What is the driving force to correct the deficiency?
- When does the corrective action need to be in place?
- Will the corrective action need to be validated by testing, third-party inspection?
- What is the impact of electing to cancel corrective action? (loss of customer, delay of certification, fines/penalties, plant shutdown, dropping certain product lines)
- Dissect the deficiency into its component parts and analyze the probable causes
- What are the First Pass possibilities for corrective action?
- Qualitatively rank the possibilities based on:
    - Technical Merit/Probability of success
    - Time to implement
    - Resource availability to implement
    - Impact on other operations
    - Impact on the operation requiring corrective action (throughput, quality, etc.)
    - Buy-in probability from Management and the Operating Team
- Recommend a limited number of attractive solutions for further consideration
    - Best Fix
    - Adequate Fix (es)
    - Quick Fix
- For any attractive solution that has a long lead time, be sure to identify interim measures if necessary to permit continuing operation until the permanent fix is in place
- Document a strategy for moving ahead
    - Goals
    - Timeline
    - Tasks
    - Available resource identification (plant, corporate, engineering firms, consultants, etc.)
    - Responsibility assignments

Project Scope Development Step

At this point, the plant staff has enough information on hand to:

- Develop a clear written scope of the work to be accomplished
- Communicate with Corporate approvers and facilitators
- Add outsiders to the team if necessary.

This is a good time to convene a planning team to apply themselves to the project.

- Key plant personnel and a team leader
- Depending on the size, value, or complexity of the project, corporate representatives from engineering, EHS, product managers, quality assurance, etc. may be important team members
- Some Food Industry consultants and engineering firms have broad experience and a wide range of practical solutions to apply to a clearly defined problem. Engaging them at this point can expand the pallet of solutions available to apply to the problem - often beyond but not overlapping the experience of plant personnel. Of course, some of their solutions will have been tried and discarded already by the plant staff and these solutions can be immediately set aside.
- Other stakeholders or advisors who have been involved up to this point

Ideally, the planning team would be convened to flesh out a comprehensive scope for a project to define all aspects of the corrective action and to recommend a specific fix. This team needs input from operations, quality assurance, maintenance, product managers for the affected products, and the engineering folks. In some rare cases, the customer for the products will be so intimately involved in process requirements that their input or presence should be considered.

The content of a written scope will vary widely depending on:

- The size and complexity of the project
- Plant or upper management requirements for documentation

The following list is a good place to start when developing an outline for the scope to be written:

- Define the need (in this case, the exact nature of the deficiencies to be corrected in this scope)
- Justify the response (identify the consequences of response and likewise the consequences of not proceeding with corrective action)
- Identify the specific goals of this work

- Clearly delineate the limits of the work. If other parties are involved in executing the work (equipment suppliers, engineers, contractors, consultants) it will be very important to specifically state what is included in the work and what is not.
- Specific milestones and completion dates for each important project component.

If there are any specific ROI or capital request limits imposed on the project, they need to be discussed and clearly identified.

With all of the above in place, a scope can be written and may need to be set up in modules to satisfy the various parties needed during approvals and implementation. Some possibilities are:

- Top Level Scope – an abbreviated and concise scope for executive reviews and possibly to include in Capital Request Documentation
- Implementation Level Scopes – to define responsibilities for each group involved in executing the project.
    - Plant-level responsibilities
    - Corporate
    - Engineer/Contractor responsibilities
    - Other Parties

Budgeting Step

This is the hard part mostly because capital budget requests must be realistic. Once a project has an approved but over-optimistic budget, it is either impossible or embarrassing to go back for more money. On the other hand, if the budget is too conservative, scope reductions that imperil the effectiveness of the corrective action can be imposed by management or the whole project can be thrown out.

The lifeblood and profitability of an entire line of products or the whole output of a particular plant can depend on successful implementation of the corrective action. This process must be taken seriously by all involved.

Because many players are involved in developing the different parts of the budget, getting a budget coordinated and completed is a critical task. There are three common events that play havoc with developing a realistic budget and each one must be clearly understood as a major risk in budget development.

- Layering of contingencies: It is human nature for each involved party to work hard to ensure that their part of the estimate is "safe" and therefore some level of contingency will be present. Then the person that assembles the final budget will add a contingency, and maybe the Project Manager will

also add one also. Surely it is better to apply a contingency only once after the entire budget data is consolidated.

- Poorly defined project components: When the scope or subsequent definition work fails to quantify a budget line item, someone is going to throw a figure at it. If a new boiler is needed and nobody has sized it, how will a budget for this line item be realistic? It is therefore important that every line item that is expected to be a "big ticket" item be subjected to due diligence.
- Overlooked items: If someone with a good grasp of the overall project does not check all of the budget line items, it is possible that something is overlooked. Overlooked items often come up in the gray areas bridging between work done by specialists (conveyors between processing and packaging, for example).

Often demolition, equipment installation, and construction work to correct deficiencies will need to occur in parallel with ongoing plant operations. This can raise the cost of executing the work by calling for some or all of the following which need to be accounted for in the budget estimate.

- Overtime premiums for work that can only be done on the weekend or during nightly sanitation shifts.
- Lost motion for mobilization and de-mobilization on a daily basis.
- Temporary isolation of areas under construction to provide complete separation from active processing or storage areas
- Relocation of piping, conduit, sprinklers, etc. during demolition
- Frequent cleaning and sanitation as opposed to cleaning and sanitation only at the completion of construction.

On some remediation projects, new equipment will be required. Developing a budget for new equipment or equipment brought in from another plant will need to be done with the same care as would be exercised on a new plant design. Equipment pricing should be based on budget quotes from the manufacturer or fabricator and freight, taxes, and installation costs should be estimated.

The engineer can prepare an outline specification for all building and building system modifications included in the remedial work. With this in hand, developing budgets for demolition, improvements, and new work can be done with reasonable accuracy – especially if drawings are also available. Using drawings and preliminary specifications rather than the "arm-waving" approach to defining work will produce much more accurate budgets.

Documentation of the budget should be done on a line-item basis and recorded on a spreadsheet. This budget will be no different than any other one in that it will be subject to plenty of massaging, so having it available on a line item basis rather than a summary basis will reduce both effort and opportunities for error as the budget goes

through revisions. The documentation should be verbose enough to include references to the source of cost for each line item.

Care must be taken to include realistic values for engineering, subcontractor and contractor overhead and profit. It is best to price this part of the work just as any other by asking them to give you a budget for these items on a percent of total project cost basis. If you share the scope of work with them, they should be able to provide reasonable and competitive values for these line items.

The final product of this step should be a tabbed spreadsheet having the top tab as summary and following tabs for:

- Demolition
- Building and Building Systems
- Refrigeration
- Equipment including installation
- Soft Costs (Engineering, Overhead and Profit)

Capital Request

At this point, the project is well enough defined and documented for preparation of capital requests.

There are two sides to every certification improvement project. One side focuses on the procedural and the other focuses on the equipment and processes necessary to support the procedures. This brief guide outlines a method to quickly assess your operations and establish an umbrella scope that will highlight what needs to be done in the areas of procedure improvement, facility improvement, and validation. Coupled with the information provided in other sections of this whitepaper, you should be well on your way to establish a Food Safety and Security plan for your operation.

Migration Planning

To find out where you're going, you often have to find out first where you are! You should consider some type of assessment tool to identify your current practices and compare them to new regulatory requirements and/or "best in class" standards for your operation. These types of assessments are often called "gap analysis" programs, with the idea to identify and quantify the "gaps" between your current state and the desirable state. Gap analysis is particularly helpful when it can be displayed by graphical means. A favorite method is to use polar graph paper and establish several "dimensions" for critical components and then plot current achievement against required achievement. The more "circular" the graph, the more in compliance and in balance your program is.

Once you've identified the "big picture" through gap analysis, you can then start to work on improving performance against the individual "dimensions" or "standards" that you used in the gap analysis. These improvements may range from recalibrating and updating analytical equipment to drafting and implementing new procedures, entirely. Whatever the need, a path to get you from "where you are" to "where you're going" should be plotted, with checkpoints along the way to test the validity and effectiveness of your chosen changes.

In many cases, you'll find that some steps are sequential, some are concurrent, and some steps are independent of each other. There may also be situations where steps are counterproductive with each other, or where a less than ideal solution has to be chosen to give the best overall performance when taken as a whole.

This whole enterprise of measuring, planning, implementing, evaluating, and adjusting to meet future needs is one aspect of a master planning activity that can be called migration planning. This approach may be used, as described above, to update your current compliance with regulatory standards. With slight adjustments and modifications it can also be employed to help you to realign your process flows and equipment layout both for better process controls and more efficient operations.

Designing Process Spaces

For these types of improvements "gap analysis" is replaced by "adjacency analysis." An adjacency analysis tries to organize the flow of materials through the process in an orderly fashion. Starting with a process flow diagram (PFD), evaluate how your current operation is laid out with regard to efficiently moving materials through the process and through the plant.

- Are there areas where material paths cross?
- Are there areas where raw materials and supplies are brought significant distance to their use points?
- Do you have adequate separation of raw, uncooked product from finished products?
- Are you doing everything you can to minimize the time spent in supplying need supplies to your process lines?
- Are there areas that require separation of one material from another?
- Is allergen separation a concern?

\An adjacency analysis can help you identify your current operating conditions.

Once you have a good adjacency analysis, you can begin to realign your process and your material handling operations for more efficient handling of materials. But, don't forget that "information" also has to flow through your operation! A good physical layout must be matched with a good data gathering and information system to get the most out of your production lines.

Validation and Qualification of New Processes and Packaging

Any new process or package should be tested and validated to ensure that it delivers consistent and safe product that will maintain usefulness through delivery and use by the ultimate consumer. Depending upon your industry and the type of products being produced, testing and validation activities will range from formal studies with strict documentation requirements to more basic protocols to insure proper installation and operation of equipment.

In general, every validation process attempts to demonstrate that the process or equipment being employed is robust and that the output of the process or operation has an output value that is consistent within a given tolerance given a normal range of operating conditions. Previous validation protocols may have required a "test to failure" scenario, but current thought tends to focus more on the normal range of operating conditions. In part, this change reflects the intention to more effectively use statistical sampling and testing as a gauge for measuring process outputs. Furthermore, where validation was once seen as a "final step" it is now framed more as a method of "continuous verification." If you're familiar with the terms IQ, OQ, and PQ regarding process validations, these are still applicable for start-up, it's just that the PQ stage has been lengthened to include the entire product lifecycle.

The upshot of this is that we now tend to think of process and equipment validation in terms of "lifecycle" rather than as discrete points along a timeline. From a manufacturing perspective, each piece of equipment has a

mechanical lifecycle from start-up to complete failure. During the normal lifecycle of the equipment, regular maintenance and rebuilding of components can keep the equipment running in a stable condition, until finally the equipment become non-repairable or fails.

Furthermore, continuous verification of the process allows us to track the effect of changes in incoming raw materials or operating conditions in a way that is more meaningful and likely to detect significant deviations than simple spot-checks.

Unfortunately, there are no universal "how-to's" or checklists to follow in developing a process validation plan. Experience and a detailed knowledge of how the process works, coupled with a good process design and experimentation program to identify key variables are the usual starting points. That being said, there are some good examples of validation formats that can be adapted to your needs. One such format may be found at http://www.scribd.com/doc/2218601/Project-and-Validation-Plan. Once you have the basic understanding of how your process should perform and how it functions, testing and validation protocols may be written and used to document your process or equipment performance.

Our Capabilities

The Austin Food and Beverage Group provides guidance, expertise and experience in Master Planning which extends well beyond the brief information provided here in our Top Ten list. Should your future plans include upgrading an existing facility or site location and planning for a new facility, please contact us at one of our offices below to find out how we can help you evaluate and improve your bottom- line.

Atlanta:	Bob Graham	404.564.3964
	Sean Barr	404.564.3980
Cleveland:	Tim Smith	440.544.2603
	Eric Bockmuller	440.544.2663
Los Angeles:	Jim Cathcart	949.451.9021
New York:	Greg Carr	908.371.9100

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5.1.1.2	**Are the measures taken to establish a suitable external environment effective**			
5.1.2	**Has the construction and ongoing operation of the premises on the site been approved by the relevant authority.**			
5.2.1	**Are product contact surfaces and those surfaces not in direct contact with food constructed of materials that will not contribute a food safety risk.**			
	Product contact surfaces are constructed of materials that does not pose a food safety risk			
	Non-food contact surfaces are constructed of materials that does not pose a food safety risk			
5.2.2.1	**Are floors constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid, easily cleaned and sloped at gradients suitable to allow the effective removal of all overflow or waste water.**			
	Floors are smooth and easily cleanable			
	Floors do graded properly			
	Floors are made of an appropriate material			
5.2.2.2	**Are drains constructed and located so they can be easily cleaned and not present a hazard.**			
	Floors do drain properly			
	Areas of floors have excessive water buildup			
5.2.2.3	**Are waste trap systems located away from any food handling area or entrance to the premises.**			
	Drain construction does not pose a food safety risk			
	Drain location does not pose a food safety risk			
5.2.2.4	**Are waste systems located away from food handling areas or entrances**			
	Waste traps are not located in product contact zones			
	Waste traps are not located near the entrance to the premises			
5.2.3.1	**Are walls, partitions, ceilings and doors of durable construction and are internal surfaces shall be**			
	smooth and impervious with a light colored finish.			
	Walls are of sound construction			
	Doors are of sound construction			
	Ceilings are of sound construction			
5.2.3.2	**Are wall to wall and wall to floor junctions designed to be easily cleaned, sealed and rounded to prevent the accumulation of food debris.**			
	Wall to wall junctions are constructed properly			
	Floor to wall junctions are constructed properly			
5.2.3.3	**Are ducting, conduit and pipes that convey services such as steam or water recessed into walls or ceilings; suspended from ceilings to service processing operations or mounted a sufficient distance from walls or ceilings to allow ease of cleaning.**			
	Ducting is constructed so as not to pose difficulty in cleaning			
	Conduits are constructed so as not to pose difficultly in cleaning			
	Pipes are constructed so as not to pose a difficultly in cleaning			
5.2.3.4	**Are doors, hatches and windows and their frames of a material and construction which meets the same functional requirements for internal walls and partitions, are doors and hatches of solid construction and windows shatterproof glass or similar material.**			
	Door are of solid construction			

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Question No.	Secondary Response			
	Windows are of solid construction			
	Windows are made of shatterproof glass in product contact areas			
	Windows are made of shatterproof glass in non-product contact areas			
5.2.3.5	**Is food 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 product.**			
	Ceilings are of sound construction			
	Ceiling construction do not pose a food safety hazard to the product			
5.2.4.1	**Are Stairs, catwalks and platforms in food processing and handling areas designed and constructed so as not to present a product contamination risk.**			
	Stairs construction do not pose a food safety hazard to the product			
	Catwalk construction do not pose a food safety hazard to the product			
	Stair and/or catwalk is of sound construction in non-product contact zones			
5.2.5.1	**Is sufficient lighting be provided in food processing and handling areas.**			
5.2.5.2	**Is lighting in processing areas and at inspection stations of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.**			
5.2.5.3	**Are light fittings shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and/or recessed into or fitted flush with the ceiling.**			
	Light fitting was found protected			
	Majority of light fixtures are shatterproof			
5.2.6.1	**Has a suitable area within the processing area been provided for the inspection of product if required.**			
	Area is designated as product inspection area			
	Area designated as product inspection is suitable			
5.2.6.2	**Has the inspection area been provided with facilities that are suitable for examination of the style product being processed and does the are have easy access to hand washing facilities and sufficient lighting to enable the thorough product inspection.**			
	Product inspection area does have easy access to hand washing facilities			
	Product inspection area does have sufficient lighting			
5.2.7.1	**Are all external windows, ventilation openings, doors and other openings effectively sealed when closed and proofed against dust, vermin and flies.**			
	Windows are protected and sealed against pests			
	Doors are adequately protected against pests			
5.2.7.2	**Are personnel access doors provided. Are they effectively fly proofed and fitted with a self closing device.**			
5.2.7.3	**Are external doors used for product access fly-proofed by at least one or a combination of the following methods: self-closing device, effective air-curtain, fly-proof screen, fly-proof annex**			
5.2.7.4	**Are electric insect control devices, pheromone or other traps and baits located so as not to present a contamination risk to product, packaging, containers or processing equipment.**			
	Insect devices are located so as not to pose a threat to product			
	Insect devices are located so as not to pose a threat to equipment			
5.2.8.1	**Has adequate ventilation been provided in enclosed processing and food handling areas.**			
5.2.8.2	**Are exhaust systems provided in areas where cooking or heating operations are carried that have the following features: prevent condensation via exterior exhaust, fans and vents fly proofed, and have positive pressure to prevent a contamination risk.**			
	Condensation is not present in cooker areas			

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Question No.	Secondary Response			
	Exhaust system are adequately fly proofed			
	Positive air pressure was available in high risk processing areas			
	Cooking areas are adequately exhausted			
5.2.9.1	**Is equipment and utensils designed, constructed, installed, operated and maintained so as not to pose a contamination threat to product.**			
	Food contact equipment's design, construction, or maintenance does not pose a food safety risk			
	Food contact utensil's design, construction, or maintenance does not pose a food safety risk			
	Non food contact equipment or utensil is maintained			
	Non food contact equipment or utensil is properly designed			
5.2.9.2	**Are benches, tables, conveyors, mixers, minces, graders and other mechanical processing equipment easily dismantled for cleaning, located so as not pose a hindrance to the cleaning of the premises and have smooth, impervious surfaces free from cracks.**			
	Food processing equipment is properly maintained			
	Food processing equipment is properly designed			
5.2.9.3	**Are product containers, tubs, bins for edible and inedible material constructed of materials that are non toxic, smooth, impervious and readily cleaned and are bins used for inedible material clearly identified.**			
	Food contact utensil is properly maintained			
	Food contact utensil is properly designed			
	Inedible containers were properly labeled			
5.2.9.4	**Is waste and overflow water from tubs, tanks and other equipment discharged direct to the floor drainage system.**			
	Waste water is not discharged on floor			
	Waste water properly draining			
5.2.9.5	**Is protective clothing manufactured from material that is non toxic and easily cleaned.**			
5.2.10.1	**Has provision been made for the effective cleaning of processing equipment, utensils and protective clothing.**			
	Protocols in place for the cleaning of equipment			
	Protocols in place for the cleaning of protective clothing			
	Protocols in place for the cleaning of utensils			
5.2.10.2	**Have suitably equipped areas been designated, are such cleaning operations controlled and are racks and containers for storing cleaned utensils and protective clothing provided as required.**			
	Designated area has been designated for utensil cleaning			
	Cleaning operations do not have a risk to impact processing operations			
	Racks are available for cleaned utensils			
	Container available for storage of protective clothing			
5.2.11.1	**Have hand wash basins been provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required**			
	Hand wash basins available for personnel			
	Hand wash basins located in processing areas			
5.2.11.2	**Are hand wash basins constructed of stainless steel or similar non-corrodible material and as a minimum supplied with: water at appropriate temperature, liquid soap, paper towels, and a means of container used paper towels.**			

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Question No.	Secondary Response			
	Hand wash basin constructed of appropriate material			
	Hand wash basin does have water at appropriate temperature			
	Liquid soap available at hand wash station			
	Paper towels available at hand wash station			
	Means to contain used paper towels available at hand wash station			
5.2.11.3	**Do facilities with exposed or processed foods or which are considered High Risk also have available hands free operated taps and hand sanitizers**			
	Hands free taps used at hand wash stations in high risk areas			
	Hand sanitizer used at hand wash stations in high risk areas			
5.2.11.4	**Have signs advising people to wash their hands, in appropriate languages, been provided in a prominent position adjacent to hand wash stations.**			
	Signage available for personnel to wash their hands			
	Signage for hand washing is located in prominent position			
5.2.12.1	**Are racks provided for the temporary storage of protective clothing when staff leave the**			
	processing area.			
	Racks are available for temporary storage of protective clothing			
	Racks for protective clothing are located properly			
5.2.12.2	**Has protective clothing racks been provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.**			
	Racks are available for protective clothing near hand wash stations			
	Racks are available for protective clothing near personnel access doorways			
5.2.13.1	**Are vehicles used in food contact, handling or processing zones or in cold storage rooms designed so as not to release any hydrocarbon emissions.**			
	Vehicle are not used in food processing area			
	Vehicles used do not present a hazard to the food product			
5.3.1.1	**Are adequate supplies of potable water (drawn from a known clean source) provided for use during processing operations, as an ingredient and for cleaning the premises and equipment.**			
	Water used in processing from a potable source			
	Water used in processing does have adequate amounts available			
5.3.1.2	**Are Supplies of hot and cold water provided as required to enable the effective cleaning of the premises and equipment.**			
	Hot water available to clean equipment			
	Water available to clean equipment			
	Water supply to clean facility was adequate to properly clean			
5.3.2.1	**Does the delivery of water within the premises ensure potable water is not contaminated.**			
	Water supply is adequately protected			
	A cross connection does not exist that could result in a back flow of water			
5.3.2.2	**Are there controls in place to control non-potable water and do those controls include; no crosscontamination between potable and non-potable water, non-potable water piping and outlets clearly identified, and back flow prevention devices installed**			
	There is no possible cross contamination between potable and non-potable water lines			
	Potable water has not been contaminated by non-potable water			
	Non-potable water pipes and outlets are labeled			

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Question No.	Secondary Response			
	Non-return devices are installed on non-potable water lines			
5.3.3.1	**Are adequate supplies of ice derived from potable water shall be provided for use during processing operations or as a processing aid or an ingredient.**			
	Ice made from potable water			
	Adequate supplies of ice available			
	Ice properly protected during use			
5.3.3.2	**Are ice rooms and receptacles constructed of materials as outlined in 5.4.1.**			
	Ice storage areas do not potentially could contaminate ice			
	Ice storage areas properly designed			
	Ice storage areas constructed from appropriate materials			
5.3.4	**Water Treatment**			
	Water treatment methods are operated properly			
	Water treatment methods are adequate for treating water			
	Water treatment equipment made of appropriate materials			
5.4.1.1	**Are the chillers, freezers and cold storage rooms designed and constructed to allow for efficient refrigeration and are they easily accessible for inspection and cleaning**			
	Supplier has confirmed effective operation of cold storage areas			
	Cold storage rooms are properly constructed for easy cleaning			
	Cold storage areas are easily accessible for inspection			
5.4.1.2	**Is sufficient refrigeration capacity available to chill, freeze, store chilled or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.**			
	Facility does have adequate refrigeration capacity			
	Facility does have the adequate freezer capacity			
5.4.1.3	**Are floors constructed of smooth, dense impact resistant material that is impervious to liquid and easily cleaned. Floors shall be effectively graded, to allow the effective removal of water under normal conditions.**			
	Floors of cold storage areas are maintained			
	Floors of cold storage areas are made of easily cleanable materials			
	Floors of cold storage areas are properly graded to allow drainage			
5.4.1.4	**Do wall, ceilings, doors, frames and hatches comply with the requirements outlined in 5.2.3.**			
	Walls of cold storage areas do comply with section 5.2.3			
	Ceilings of cold storage areas do comply with section 5.2.3			
	Doors of cold storage areas do comply with section 5.2.3			
5.4.1.5	**Do light fittings shall comply with the requirements outlined in 5.2.5.2.**			
5.4.1.6	**Is discharge from defrost lines connected to the drainage system.**			
	No Excessive condensation found in cold storage area			
	Water discharge in cold storage area does not pose a risk to contaminate product			
	Water discharge in cold storage area is not directly on stored product			
	No Excessive frost in freezer on ceiling and walls			
	No Excessive frost in freezer on stored product			
5.4.1.7	**Are freezing, chilling and cold storage rooms fitted with temperature monitoring equipment that is easily readable and accessible and located so as to monitor the warmest part of the room.**			

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Question No.	Secondary Response			
	Cold storage areas do have temperature monitoring equipment			
	Temperature monitoring devices is located near the warmest part of cold storage area			
	Temperature monitoring devices are easily accessible			
5.4.1.8	**Are loading and unloading docks designed to protect product during loading and unloading.**			
	Docks are designed to adequately protect product			
	Docks areas are adequately maintained			
5.4.2.1	**Are rooms used for the storage of product ingredients and other dry goods located away from wet areas and are they constructed to protect the product from contamination and deterioration.**			
	Product storage rooms are not located near wet processing to allow for potential water contamination			
	Storage rooms are adequately designed to protect product			
5.4.2.2	**Do Light fittings comply with the requirements outlined in 5.2.5.2.**			
5.4.3.1	**Is storage of food packaging materials separate and located away from wet areas and is the storage location constructed to protect packaging from contamination and deterioration.**			
	Packaging storage rooms are not located near wet processing to allow for potential water contamination			
	Storage rooms are adequately designed to protect product			
5.4.3.2	**Do light fittings comply with the requirements outlined in 5.2.5.2.**			
5.4.3.3	**Are racks provided for the storage of packaging constructed of impervious materials, are they constructed to protect the product from contamination and deterioration and are they constructed to prevent packaging from becoming a harborage area.**			
	Packaging racks are made of material that is easily cleanable			
	Packaging racks do allow access to floor / wall junction for cleaning			
	Packaging storage areas is not found to be a pest harborage area			
5.4.4.1	**Are storage rooms designed and constructed to allow for the hygienic and efficient storage of equipment and receptacles.**			
	Equipment storage area does allow access for cleaning			
	Equipment storage area does protect equipment during storage			
5.4.4.2	**Are processing utensils and packaging stored in areas separate to those used to store hazardous chemicals and toxic substances.**			
	Chemicals not stored directly next or over the top of utensils			
	Chemicals not stored directly next or over the top of packaging			
5.4.5.1	**Are Hazardous Chemicals and Toxic Substances stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which product is handled, stored or transported.**			
	Chemicals present no hazard to staff due to improper storage			
	Chemicals are not stored next to or directly over product			
5.4.5.2	**Are pesticides, rodenticides, fumigants and insecticides stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers.**			
	Sanitizers and detergents are not stored with pesticides or other toxic chemicals			
	Chemicals are stored in original container			
5.4.5.3.i	**Hazardous chemical storage facilities shall be: complaint with local regulations, be adequate ventilated and appropriately signed and be secure.**			
	Chemical storage rooms do meet local regulations			
	Chemical storage rooms are properly ventilated			

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Question No.	Secondary Response			
	Chemical storage room is properly signed			
	Chemical storage room is secured			
	No Cross contamination observed between chemicals			
5.4.5.3.ii	**Hazardous chemical storage facilities must also have easily accessible written instructions and inventory of chemicals, have suitable first aid equipment and emergency shower, be designed to contain spills and have spillage kits.**			
	Instructions are available for handling chemicals in storage area			
	Inventory of chemicals stored in storage area			
	First aid equipment available			
	Personal protection equipment or clothing is available in storage area			
	Emergency shower or wash facilities are available			
	Spillage kit or cleanup equipment is available			
5.4.6.1	**Is there evidence that the alternative storage conditions ensure that there is no risk to the integrity, food safety and quality**			
5.5.1.1	**Is the process flow designed to prevent cross contamination and organized so there is a continuous flow of product through the process.**			
	Design of process flow does not allow for cross contamination			
	Process flow does not enable direct opportunity for cross contamination			
5.5.2.1	**Are dry, ingredients and packaging received and stored separately from frozen and chilled raw materials and are unprocessed raw materials received and segregated to ensure there is no cross contamination**			
	Packaging receiving is separated from raw materials			
	Raw material and finished product received and handled at same location with prevention steps taken			
	Dry materials are not received in area where potential for contamination exists			
5.5.3.1	**Is thawing of product undertaken in equipment and rooms appropriate for the purpose.**			
	Product is not thawed in ways that pose a food safety risk			
	Product is not thawed in a way that poses a food quality risk			
5.5.3.2	**Is equipment for water thawing continuous flow to ensure the water exchange rate and temperature does not contribute to product deterioration or contamination. Is water overflow directed into floor drainage system.**			
	Water thawing of product is controlled and does not pose risk to product			
	Water used in water thawing of product is properly disposed of			
	Water used in thawing is properly cooled			
	Product is monitored during thawing process			
5.5.3.3	**Are air thawing facilities designed to thaw product under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.**			
	Air thawing of product is controlled and does not pose a risk to product			
	Product is monitored during thawing process			
5.5.3.4	**Is provision made for the containment and regular disposal of used cartons and packaging so that there is no risk to product.**			
	Used containers are properly contained in facility			
	Used packaging is properly contained in facility			
	Used containers and packaging are regularly disposed of in facility			

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Question No.	Secondary Response			
	Used containers and packaging do not pose a risk to product within facility			
	Staff observed following company policy			
5.5.4.1.i	**Are sensitive areas in which High Risk Food have undergone a "kill" step, a "food safety intervention" or is subject to post process handling separated from other processes or raw materials to ensure cross contamination is minimized;**			
	High risk areas of facility are adequately segregated from raw material handling areas			
	High risk areas of facility are not in direct contact with raw material handling areas			
	High risk, finished product is not at risk due to potential contact with raw materials			
	Staff observed following company policy			
5.5.4.1.ii	**Are areas in which High Risk Processes are conducted are only serviced by staff dedicated to that function;**			
	Staff pass between high risk and raw handling areas with hygiene step			
	Staff in high risk areas are dedicated and adequate controls are in place			
5.5.4.1.iii	**Are staff access points are located, designed and equipped to enable staff to don distinctive protective clothing and to practice a high level of personal hygiene**			
	High risk areas have controlled access to ensure adequate staff hygiene			
	Personal protective clothing is required in high risk areas			
	Staff observed following company policy on entering high risk areas			
5.5.4.1.iv	**Are product transfer points located and designed so as not to compromise high risk segregation and minimize risk of cross contamination**			
	Product transfer between high risk areas and other areas poses no risk to product			
	Staff observed following company policy on product transfer policies			
5.5.5.1.i	**Are ingredients physically separated from ingredients identified as incompatible with the specialty food**			
	Physical separation exists for incompatible ingredients and other ingredients			
	Incompatible ingredients are not comingled with other ingredients			
5.5.5.1.ii	**Is processing completed in separate rooms or scheduled as a first production run, or carried out after the completion of a thorough sanitation activity**			
	Specialty foods are processed with adequate controls to ensure protection			
	Observation of processing of specialty foods shows no potential contamination with non-like product			
5.5.5.1.iii	**Is the finished product stored and transported in separate units or isolated by a physical barrier**			
	Finished specialty product is separated from non-like product			
	Finished specialty product is adequately protected during storage			
	Finished specialty product is adequately protected during transport			
5.6.1.1	**Are on site laboratories located separate from any food processing or handling activity and designed to limit access only to authorized personnel.**			
	On-site laboratory is separated from food processing area			
	Laboratory access is restricted to only authorized personnel			
5.6.1.2	**Is provision made to isolate and contain all laboratory waste held on the premises and are laboratory waste water outlets at a minimum down stream of drains that service food processing and handling areas.**			
	Laboratory waste is properly treated prior to disposal			
	Laboratory waste is adequately contained and separated from facility waste			

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Question No.	Secondary Response			
5.6.1.3	**Is signage identifying the laboratory area as a restricted area accessible only by authorized personnel.**			
	Adequate signage is available for the laboratory			
	Signage does state that only authorized personnel allowed in laboratory			
5.7.1.1	**Are staff amenities supplied with appropriate lighting and ventilation for the use of all persons engaged in the handling and processing of product.**			
	Staff amenities do have adequate lighting			
	Staff amenities do have adequate ventilation			
	Staff amenities are available to all staff who handle product			
5.7.2.1	**Are facilities provided to enable staff and visitors to change into and out of protective clothing as required.**			
	Adequate amenities for visitors and staff			
	Amenities are available to change into protective clothing			
5.7.2.2	**Are change rooms provided for staff engaged in the processing of High Risk Foods or processing operations in which clothing can be soiled.**			
	Change rooms provided for high risk personnel			
	Change rooms provided for personnel engaged in highly soiled processing			
5.7.2.3	**Is provision made for staff to store their street clothing and personal items.**			
	Amenities available for the storage of staff personal items			
	Storage of personal items is separated from processing areas			
5.7.3.1	**Where required are there a sufficient number of showers provided for use by staff.**			
	There are enough showers where they are required			
	Showers are available where they are required			
5.7.4.1	**Is provision made for the laundering of clothing worn by staff engaged in High Risk Processes and for staff engaged in processing operations in which clothing can be heavily soiled.**			
	Provisions are made for laundering of protective clothing worn by staff			
	Provisions are available for laundering of high risk protective clothing			
5.7.5.1	**Are sanitary facilities designed, constructed and located so that they are easily accessible to staff and are they separate from any processing and food handling operations.**			
	Sanitary facilities are separated from processing areas			
	Sanitary facilities are easily accessible to staff			
	Sanitary facilities are properly designed			
5.7.5.2	**Are toilet rooms designed so that they: are not directly accessible from any food handling area, cater for the maximum staff, and can be easily cleaned and maintained.**			
	Toilet rooms open directly into processing areas with other controls in place			
	Adequate controls are in place to protect processing areas from toilet rooms			
	Toilet rooms are of adequate number for the maximum number of staff			
	Toilet rooms can be easily cleaned			
	Toilet rooms are constructed so that they can be easily maintained			
5.7.5.3	**Is sanitary drainage connected to any other drains on the premise and not directed into a septic or sewer system**			
5.7.5.4	**Are hand wash basins provided immediately outside or inside toilet room and designed as outline in 5.2.11.1**			

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Question No.	Secondary Response			
	Hand was basins are available near the toilet room			
	Hand wash basin near the toilet room does meet section 5.2.11.1			
5.7.5.5	**Is signage in appropriate languages advising people to wash their hands provided in a prominent position at the exit of toilet room and over each hand wash basin.**			
	Hand washing signs are available near toilet room			
	Hand washing sign is available over each hand wash basin			
	Hand washing sign is available in all necessary languages			
5.7.6.1	**Are lunch room facilities separate from food contact/handling areas**			
	Lunch facilities are separated from processing areas			
	Lunch facilities are separated from product storage or handling area			
5.7.6.2	**Are lunch room facilities ventilated and well lit, provided with adequate tables for staff, equipped with a sink serviced with hot and cold potable water, and equipped with refrigeration and heating facilities**			
	Lunch room facility are properly ventilated			
	Lunch room facility are well lit			
	Lunch room facility does adequately fit staff			
	Sink with hot and cold water is available in lunch facility			
	Properly heating or cooling facilities are provided in lunch facility			
5.7.6.3	**Is signage in appropriate languages advising people to wash their hands before entering the food processing areas posted in prominent locations at the lunch room exits**			
	Hand wash sign available at the exit of the lunch facility			
	Signage at the exit of the lunch facility is in proper language			
5.8.1.1	**Are first aid facilities provided and are suitable arrangements available when more specialized care is required**			
	First aid facilities are available			
	Arrangements have been made to provide for more specialized care as required			
5.9.1.1	**Is waste effectively, efficiently and regularly removed from the premises and the surrounds so as not to pose a threat to the hygienic operation of the premises**			
	Waste is properly contained within facility			
	Waste is properly contained on the exterior of the facility			
5.9.1.2	**Has adequate provision been made for the disposal of all solid processing waste. Is waste that is held on-site prior to disposal adequately separated, contained and fly proofed so as not to present a hazard**			
	Solid processing waste is adequately contained			
	Solid processing waste is properly held in a separate facility			
5.9.1.3	**Has adequate provision been made for the disposal of all liquid processing waste. Is waste that is held on-site prior to disposal adequately separated, contained and fly proofed so as not to present a hazard**			
	Liquid waste is adequately contained			
	Liquid waste is properly held in a separate facility			
5.10.1	**Are the grounds and area surrounding the premises maintained to minimize dust and kept free of waste or accumulated debris**			
	Exterior grounds are maintained and provide pest harborage areas			

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Question No.	Secondary Response			
	Exterior grounds are managed to minimize dust or other hazards			
	Exterior grounds are kept free of waste			
5.10.2	**Are paths, roadways, and loading and unloading areas maintained so as not to present a hazard to efficient and effective operations of the premises**			
	Exterior paths and roadways are managed to minimize dust or other hazards			
	Exterior loading and unloading areas are maintained to minimize hazards			
7.1.1.2	**Is sterilizing and pasteurizing equipment designed, built, installed, maintained and operated appropriately to ensure**			
	Equipment is properly maintained to ensure each unit receives sterilizing treatment			
	Equipment is properly designed to ensure that each unit receives sterilizing treatment			
	The heating medium temperature is monitored			
	Each unit does receive a uniform heating treatment			
	Sterilizing equipment does have pressure gauge			
	Sterilizing equipment does have recording thermometer			
	Sterilizing equipment does to have appropriate temperature-indicating device			
	Temperature indicating device is easily observed by the operator			
	A continuous recording device to record the scheduled process is available			
7.1.2.2	**Are records of the scheduled processes maintained**			
7.1.3.1	**Are only properly determined scheduled processes used to complete thermal processing foods and are the scheduled processes and venting displayed in a prominent position and only performed and supervised by suitably trained personnel**			
	Scheduled process is properly displayed for operator			
	Scheduled process is performed by adequately trained operator			
	Schedule process is supervised by adequately trained supervisor			
7.1.3.2	**Are critical factors such as the product initial temperature, maximum net or drained weight, minimum headspace, consistency and style of the product and minimum closing vacuum also taken into account to influence the slowest heating point in the container**			
	Adequate process checks of schedule process are completed			
	Frequency of process checks does take into account product initial temperature			
	Frequency of process checks does take into account weight			
	Frequency of process checks does take into account minimum headspace			
	Frequency of process checks does take into account consistency of product			
	Frequency of process checks does take into account product style			
	Frequency of process checks does take into account minimum closing vacuum			
7.1.3.4	**Is there evidence that the cooling water is chlorinated, maintained at a measureable level of residual chlorine, re-circulated cooling water filtered, tested for chlorine after each cycle, and are records kept showing suitability**			
	Cooling water is of suitable microbiological quality			
	Cooling water is properly chlorinated			
	Cooling water which is recirculated is filtered			
	Cooling water is monitored for chlorine			
	Controls for non-chlorine treated cooling water do meeting section 5.3.4 and section 6.8			
	Records of cooling water suitability are maintained			