

TWIN CITY PRODUCE OF SPRINGDALE, LLC



FOOD SAFETY PROCEDURES

FOR

GOOD STORAGE AND DISTRIBUTION PRACTICES

SQF EDITION 9.0 MODULE 2

FOR FSC 26: STORAGE AND DISTRIBUTION OF FOOD PRODUCTS (GFSI JI, AND JII)

REVISED BY PRACTITIONER

JANUARY 2026

APPROVED FOR DISTRIBUTION BY SSM

FEBRUARY 2026

Background Scope:**Final Review: Differences Between Current Procedures and Latest Policy (2025-2026)**

UPDATES:

1. 2.1.1.6 Employee Safe Policy and Procedure Training Discrepancy: Procedures say “The practitioner signs off each employee upon receipt of proof of completing training.” Policy Element 2.1.1.6 says the Practitioner keeps a training matrix and signs off each employee. **Updated Procedure:**

2.1.1.6 Employee Safe Policy and Procedure Training Background Scope: The SSM ensures the site’s training needs are fully resourced, implemented and meet the requirements outlined in system elements 2.9 and that employees meet the required competencies to carry out those functions affecting the legality and safety of food products.

Instructions: The Practitioner records all training by employee on a Training Matrix, which is reviewed annually. All employees receive “On-the-Job” training upon hiring from the area Supervisor and textbook-based training annually from internally developed training books. Training includes:

1. Overview of the Safe Food Policy and implementation
2. Employee Hygiene and Safety practices
3. Site Security and Crisis Response, and
4. Safety for Employment Specific Tasks. Trainings are held annually and OTJ within 90 days of hiring; notices of any mid-year policy changes are posted throughout the site; and provides immediate training to all employees whose duties are impacted by any such changes. Training Books are reviewed and updated annually and when policy change notices are received impacting services within Storage and Distribution. When an employee receives a Training Book, notice for refresher, or new policy procedure, they must sign and return the signed document that states they have completed the training. It is possible that the Practitioner may require a written test for competency. If so, copy of the written exam is attached to the signed record.

2. 2.1.2.7 Employee Comprehension and Communication Program Discrepancy: Procedures do not mention that Slack is tabled. Policy Preface states “the Slack incorporation is tabled until staff are more comfortable with technology. We rely heavily on text messaging and group chats”. **Updated Procedure:**

2.1.2.7 Employee Comprehension and Communication Program Background Scope: The SSM guarantees all staff are continually informed of their Safe Food and regulatory responsibilities, actively comprehend their role in meeting the requirements of the SQF Food Safety Code for Storage and Distribution, and the individual and collective responsibility to report food safety problems to the SSM or Practitioner immediately. All reporting instructions and forms remain readily available for all employees.

Instructions: The Practitioner maintains the Communication Program which encompasses the requirements of 2.1.2.7. The Practitioner reviews daily news feeds for relevant information impacting

**Background Scope:**

products, site operation, or the food industry. Any recall notices or pending warnings are followed and disseminated to Team members based on priority. If a recall notice, the Practitioner sends a group text message to all team members to initiate recall procedures. Safety Policy and Procedure information on the shared drive is routinely updated and sorted by year and subject. All employees have access to the shared drive. Hard copies of all Safety Policy and Procedure are stored in the reference library in the Practitioner's office and readily available to all employees. Slack incorporation is tabled until staff are more comfortable with technology. We rely heavily on text messaging and group chats to maintain communication, project management, and follow-up.

3. 2.1.2 Management Review Discrepancy: Procedures still include 2.1.2.9 (scorecard tables and old metrics). Policy has no Element 2.1.2.9 (Management Review stops at 2.1.2.2). **Action:** DELETED / No Longer Applicable. Remove the entire 2.1.2.9 section from the Procedures.

Background Scope:

4. 2.2 Document Control and Records Discrepancy: Procedures emphasize hard-copy Reference Library as primary. Policy Preface states “Halfway through the year we transitioned to digital records but have printed the summaries for the audit. Paper records of mandatory clauses are printed for both V&V and contingency.” **Updated Procedure:**

2.2 Document Control and Records Background Scope: The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Storage and Distribution shall be maintained in electronic and/or hard copy documentation.

Instructions: Hard copies of mandatory clauses are printed for verification/validation and contingency only. All other records are maintained digitally on the shared drive (Google Drive) with printed summaries retained for audit. Text messaging and group chats are used for real-time follow-up on action items. The Document Registry and GSDP System Review remain in the Practitioner’s office for reference. The Practitioner maintains a file of all Document Change requests and internal audits. Records are retrievable for a minimum of three (3) years or the duration of certification.

All other sections in the current Procedures are now aligned with the latest Policy.



Background Scope:

2.0 SYSTEM ELEMENT PROCEDURES/INSTRUCTIONS

2.1 Management Commitment

2.1.1.1 Food Safety Policy Statement Background Scope: As regulatory compliance and service to customer and employee alike, the combined policy and mission statement is posted throughout the site and in the Policy Binder. See instructions below.

Instructions (2.1.1.1 – 2.1.1.2): Update the above posting locations annually and when policy or vision change impacts the established objectives and mission of the site.

Table: Vision and Statement Posting (2.1.1.1 – 2.1.1.2):

LOCATION	POLICY	MISSION
Breakroom	X (English/Spanish)	X (English/Spanish)
Office/Warehouse Entry Hall	X (English/Spanish)	X (English/Spanish)
Lobby/Reception	X (English/Spanish)	X (English/Spanish)
Warehouse Comm. Board	X (English/Spanish)	X (English/Spanish)

If any sign holders or their contents are damaged, notify the practitioner. The technician is to:

1. Update the Spanish versions of the postings and print the English and Spanish versions
2. Have the Company President review the final prints and sign
3. Make copies of the signed prints and replace the postings in each of the above locations
4. Notify the practitioner upon completion

2.1.1.2 Safe Food Mission Statement – English and Spanish (posting) Background Scope: The combined policy and mission statement is posted throughout the site (in English and Spanish, languages spoken at the Warehouse and with our customers and vendors) and in the Policy Binder.

**Background Scope:**

2.1.1.3 Reporting Structure and Job Descriptions Background Scope: The company's organization chart outlines reporting structure, departments, responsibilities, and includes the food safety team and duties. Each employee responsible with the compliance of an objective must have their duties updated, the chart updated, and new copies disseminated to all impacted parties.

Instructions: If an employee leaves the company who has safety duties, the alternate must be notified immediately of new responsibilities until such time a replacement is identified and trained. All duties listed on the organization chart are added to the employee's personnel file. If any assigned employees leave the company, those seeking to replace the employee must possess not only a similar skillset for day-to-day operations, but also the aptitude and competency to carry out the SQF team duties.

2.1.1.4 SQF Practitioner Designation and Authority Background Scope: The designated SQF Practitioner is empowered by the Company President to ensure all resources necessary are available to achieve the food safety objectives, customer requirements, and all aspects of the SQF System.

Instructions: The Practitioner works daily with employees and team members to ensure all aspects are honored during the day-to-day operations. The Practitioner randomly shadows employees within the warehouse to ensure their competency to complete their daily tasks safely and protect the safety of all products when receiving, storing, picking, shipping, and delivering to customers. If an employee is not following procedures, the Practitioner may notify the supervisor, but is empowered to correct the employee executing the task in the moment.

2.1.1.5 Practitioner Employment Classification and Status Background Scope: The SQF practitioner is a full-time employee, reporting directly to the Company President, holding a key position of responsibility, trained in the HACCP and SQF procedures. The practitioner is competent to implement and maintain the HACCP-based food safety plan/s and has SQF Food Safety Code for Storage and Distribution understanding and the ability to implement and maintain the SQF system relevant to the site's certification.

Instructions: HR: Ensure the Practitioner's payroll status is full-time and that all training expenses related to the Safe Food Policy/Plan are duly noted as such in the Company's records. The Practitioner is to remain current on all related regulations, policies, and update Company procedures accordingly. The Practitioner may have other responsibilities within the company but no less than 75% of their time is delegated to the development, implementation, analysis, and maintenance of the Safe Food Policy Plan.

**Background Scope:**

2.1.1.6 Employee Safe Policy and Procedure Training Background Scope: The SSM ensures the site's training needs are fully resourced, implemented and meet the requirements outlined in system elements 2.9 and that employees meet the required competencies to carry out those functions affecting the legality and safety of food products.

Instructions: The Practitioner records all training by employee on a Training Matrix, which is reviewed annually. All employees receive "On-the-Job" training upon hiring from the area Supervisor and textbook-based training annually from internally developed training books. Training includes:

1. Overview of the Safe Food Policy and implementation
2. Employee Hygiene and Safety practices
3. Site Security and Crisis Response, and
4. Safety for Employment Specific Tasks. Trainings are held annually and OTJ within 90 days of hiring; notices of any mid-year policy changes are posted throughout the site; and provides immediate training to all employees whose duties are impacted by any such changes. Training Books are reviewed and updated annually and when policy change notices are received impacting services within Storage and Distribution. When an employee receives a Training Book, notice for refresher, or new policy procedure, they must sign and return the signed document that states they have completed the training. It is possible that the Practitioner may require a written test for competency. If so, copy of the written exam is attached to the signed record.

2.1.1.7 Integrity and Continued Operation of the Food Safety System Background Scope: Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

Instructions: The Practitioner maintains a current organizational chart of all employees with food safety specific duties. This chart is shared with HR. Each employee with Food Safety-specific duties has those duties listed on the Personnel file. If a critical employee is out sick, vacation, or separates from the company, those duties are immediately re-assigned to the backup until the position is filled.

2.1.1.8 Blackout Periods for Unannounced Audits Background Scope: N/A

2.1.2 Management Review (Mandatory) Background Scope: The SQF system shall be reviewed by senior site management at least annually and include changes to food safety management system documentation, food safety culture performance, food safety objectives and performance measures, corrective and preventative actions, hazard and risk management system, and follow-up action items from previous management review. The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System.

**Background Scope:**

Instructions: The SQF Practitioner compiles facts pertaining to policy changes, audit findings, corrective actions, customer complaints, hazard and risk management, and coordinates with the SSM on the status and progress of previous meeting action items. The Management Review Checklist serves as a template for the monthly compilation cover page to ensure that key items are reviewed. All checklist items are covered at least annually. The Practitioner documents the additional 10% improvement in computer accuracy achieved since last March, the transition to digital records (with printed summaries retained for audit), and the use of text messaging and group chats for communication, project management, and follow-up on SQF-related actions. These metrics shall be presented at each quarterly management review and included in the Monthly Management Summary.

2.1.3 Complaint Management (Mandatory) Background Scope: The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities arising from products stored or handled on-site shall be documented and implemented. Adverse trends in customer complaint data shall be investigated and analyzed, and the root cause established. Corrective and preventative action shall be implemented based on the seriousness of the incident.

Instructions: As received, the supervisor ensures that individuals handling complaints conduct themselves professionally and cordially. The complaints process is verified through QuickBooks. When a customer complains, remain patient and professional. If any one customer repeatedly complains about the condition of a product, establish a customer requirement and note to their account. At least annually the Practitioner digitally reviews complaints to ensure customers are properly classified, produce dumping is occurring before expiry, and any unresolved complaints are handled with Management, Sales Rep and/or Driver, and customer directly and documented. The Practitioner runs QuickBooks reports to track customer complaints via returns and exchanges. Corrective and preventative actions are implemented based on the seriousness of the incident and the root cause analysis.

**Background Scope:**

2.2 Document Control and Records Background Scope: The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Storage and Distribution shall be maintained in electronic and/or hard copy documentation. Food safety plans, Good Storage and Distribution Practices and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All records shall be legible, confirmed by those undertaking monitoring activities, readily accessible, retrievable, and securely stored.

Instructions: Hard copies of mandatory clauses are printed for verification/validation and contingency only. All other records are maintained digitally on the shared drive (Google Drive) with printed summaries retained for audit. Text messaging and group chats are used for real-time follow-up on action items. The Document Registry and GSDP System Review remain in the Practitioner's office for reference. The Practitioner maintains a file of all Document Change requests and internal audits. Records are retrievable for a minimum of three (3) years or the duration of certification.

NOTE: There are QR Codes posted throughout the warehouse and office. All data is available through the website's intranet.



Background Scope:

<https://twincitynwa.com>

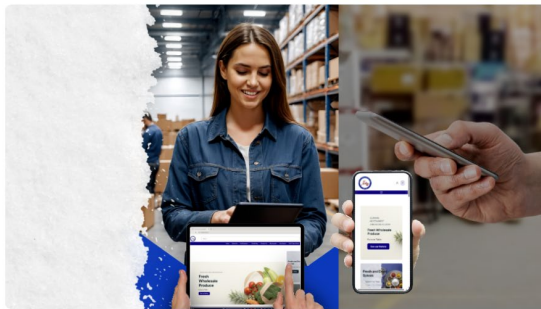
Search

TCPS Team Portal

Click on TCPS Team Portal

You may use the Team Portal Home or the exact procedure or online form you need.

Protected: Team Portal Home



Twin City Produce, Springdale Employee Portal

Access 24/7 for current employees of Twin City Produce, Springdale, AR

QUICK LINKS:

- TCPS Delivery Driver's Handbook
- Team Portal Home
- One-Stop Safety Shop
- Team Training Center
- TCPS Fleet App
- Good Storage & Distribution Practices
- Fleet Temp Check
- EJE 120 Electric Pallet Jack Spec
- Equipment Calibration
- Clarke Focus II Use Guide
- SQF Food Safety Policies and Procedures
- SMETA Ethical Trade Initiative Compliance

TCPS Team Portal

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The

Portal is PASSWORD PROTECTED. You should have received the password with your pay clock pin. If not message: 479-283-3543 for access.

Background Scope:

2.3 Specifications and Supplier Approval Background Scope: Product handling and storage requirements for all products received, stored, and intended for distribution shall be documented, current, approved by the site and their customer (if applicable), accessible to relevant staff, and include temperature requirements, storage conditions, packaging requirements, and handling and transportation conditions. Incoming supplies shall comply with relevant legislation, be supplied by an approved supplier, and be verified to ensure product safety is not compromised. Contract service providers that have an impact on product safety shall be documented and reviewed.

Instructions: The Product Description List requires quarterly review. The Warehouse Manager maintains a Safety Data Sheets (SDS) Binder of the products used in the execution of our daily tasks but not for resale. The Warehouse Manager reviews prior to purchasing that all incoming materials and ingredients comply with the relevant legislation. Incoming supplies are compared against the list of approved products for food safety. The Practitioner reviews each company's website for its safety compliance and assurance, downloads its MSDS for the relevant supply and stores it in the MSDS binder. Contract service companies that may come into contact with produce directly provide specifications outlining their service to ensure compliance with our food safety program. Each contract service company adheres to our safety policy and procedures. The documents are maintained in individual binders with all contracts and agreements within and updated annually. The practitioner maintains a list of applicable contractors.



Background Scope:

This is the current list of our Service Providers. If you are in need of repair or maintenance, first notify the Warehouse Manager. If he is not available, call Travis at **479-283-5115** before contacting a Provider for assistance:

Company Name	Service	Start of Contract	Expiry of Contract	Training	Approved By
Rid-A-Pest	Pest Control	5/1/13	5/1/26	GSDP	President
Ballessteros Transport	Transportation	P.O. Required	P.O. Required	GSDP	President
Jerma Transportation	Transportation	P.O. Required	P.O. Required	GSDP	President
HC Transportation	Transportation	P.O. Required	P.O. Required	GSDP	President
Inland	Waste	No contract	No contract	GSDP	President
Clarence Roberts	Calibration	P.O. Required	P.O. Required	GSDP	President
Landlord	Heating	By landlord*	By landlord	GSDP	President
Lps forklift	Equipment	P.O. Required	P.O. Required	GSDP	President
Alert Alarm	Alarm system	NA	NA	GSDP	President
IN HOUSE	Legal	Open	Open	NA	President
	Public Relations	Open	Open	NA	President
American Fire and Safety	Fire Extinguishers	By landlord*	By landlord	GSDP	Landlord
Air Works	Sprinkler system	By landlord*	By landlord	GSDP	Landlord

All other sections (2.4 through 2.9) in the existing procedures are already aligned with the latest Policy and require no change.

Background Scope:**2.4 Food Safety System 2.4.1****Food Legislation Background**Scope:

2.4.1.1s: The site ensures that the food delivered to the customer is handled in a manner that complies with the relevant legislation in the country of its origin and destination.

2.4.1.2s: The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments and relevant industry codes of practice shall be documented and implemented.

Instructions:

The SSM receives all notices in the twincityproduce@gmail.com email account. If the SSM is not in on any given day, the Practitioner or senior staff on site reviews the email with a keyword search:

- Recall
- Withdrawal
- Regulation
- SQFI

Check each result for any pertinent information impacting the warehouse. If none, no action is necessary.

If any results return notices impacting the warehouse, take the appropriate action. If information is received by anyone other than the SSM and Practitioner, notify them for next steps.

2.4.2 Good Storage and Distribution Practices BackgroundScope:

2.4.2.1s: The site shall ensure the Good Storage Distribution Practices described in Module 12 of this Code are applied, or exempted according to a risk analysis outlining the justification for exclusion or evidence of the effectiveness to ensure that food safety is not compromised.

2.4.2.2s: Those Good Distribution Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented.

Instructions:

The new online Pre-Op form is completed by the Warehouse Food Safety Coordinator and includes the bathroom cleaning and sanitation. If not available, the SQF Technician or properly trained employee with no duty conflict completes the form.

Any non-conformances are immediately documented on the online NCR and action is immediately taken to correct the discrepancy.



Background Scope:

Every three months, review the checklists for any patterns of “breakdown”

If identified, develop an action plan for permanent correction and a preventative action to minimize the likelihood of the problem returning.

2.4.3 Food Safety Plan (M) Background

Scope:

2.4.3.1s: A food safety plan or HACCP based plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines

Instructions:

The HACCP is reviewed annually. Begin by reviewing the current policy. Compare section codes to existing HACCP. Verify each form enclosed and complete each step of assessing and reviewing our current HACCP for compliance and accuracy. Each section requirement and fulfillment immediately follows this page.

SEE THE HACCP PLAN IN THE POLICY BINDER



2.4.4 Approved Suppliers Procedures

Background Scope:

2.4.4.1s: Incoming goods (identified in 2.3.1 and 2.3.2) that may have an impact on product safety shall be supplied by an approved supplier.

2.4.4.2s: Incoming goods received from non-approved suppliers shall be acceptable in an emergency situation provided they are inspected or analyzed before use. **Update 02/15/25: SMETA Pillar Compliance**

Instructions:

The Practitioner runs an annual Purchases by Vendor and Products Return report to calculate performance. Vendors are contacted annually for food safety certifications and are cross referenced in public agencies, such as primus and SQF for certifications and FDA for Recalls and then calculates their rating. The Supplier Matrix completes all calculations and is located in the Food Safety Folder on the shared drive:

2025-2026
SUPPLIER APPROVAL

Vendor Name	Type (Dropdown)	1 Food Safety Certification	2 Delivery/ Availability	3 Quality	4 Shorts/ Overages	5 Response	6 Price	7 (OSHA)	Ratings Total	Approval Rating (Check one)	Result
KEITH CONNELL	PRODUCE	5	5	5	5	5	4	5	34	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: No Restrictions
NOGALES PRODUCE, INC.	PRODUCE	4	4	3	3	5	5	3	27	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
SWEET SEASONS, LLC	PRODUCE	5	4	4	4	5	5	2	29	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
MCNEWS PRODUCE	PRODUCE	5	4	4	5	5	5	5	33	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: No Restrictions
CASA DEL AGUICATE LLC	PRODUCE	4	4	4	5	5	4	2	28	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
AMORE PRODUCE LLC	PRODUCE	5	4	4	5	5	4	2	29	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
LIBERTY FRUIT COMPANY INC.	PRODUCE	5	4	4	5	5	4	2	29	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
OZARK MOUNTAIN PRODUCE	PRODUCE	4	4	4	5	5	4	2	28	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
OZARKS COCA COLA	DRINKS	5	4	4	5	5	4	2	29	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection
WESTPACK AVOCADO	PRODUCE	4	4	4	5	5	4	2	28	<input type="checkbox"/> 35-30 Approved: No Restrictions <input type="checkbox"/> 29-27 Approved: Per Load Inspection <input type="checkbox"/> 27-25 Exception: Emergency Provider (PLI) <input type="checkbox"/> 27-25 Exception: Sole Provider (PLI) <input type="checkbox"/> 25 and below Denied: No grounds for Exception	Approved: Per Load Inspection

And at this link:

<https://1drv.ms/x/c/a03dc01a74d31327/IQCdIVnlbZbMT7DZCyEvJqf6AcZPk-M-Cqi3mwvuMTfDjHE?e=etoeFg>



If the supplier meets all the minimum food safety requirements then they are approved. If the supplier does not meet all of the food safety minimum requirements then a 2nd party audit is required before being approved. New suppliers may be trialed from time to time, and the Warehouse Manager will determine what extra testing or surveillance will be required until confidence is attained.

2.4.4.4 Twin City Produce and the supplier agree to specifications, ensuring maximum food safety requirement transparency. It is the supplier's responsibility to ensure the security of any products while in transit. All products are checked on arrival for any obvious security breaches or signs of product tampering.

2.4.4.7 The Senior Site Manager maintains an approved suppliers and products list.

2.4.5 Non-conforming Product or Equipment

Background Scope:

2.4.5.1 All employees are trained to identify any product, material, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery including, equipment, process or personnel activity that does not conform to the company standards.

Instructions:

Non-conforming Training is part of their Employment Orientation and is an on-going requirement. By training all employees, any may initiate a non-conformance or advise his/her supervisor of the condition, both improving and enhancing our monitoring process. Non-conformities may occur anywhere from receiving, storage, and handling or in delivery for any of the above and at any stage.

Process requires documenting all non-conformances in the NCR online form and if completed by a non-SQF team member, the Warehouse Manager receives immediate notification.

In accordance with our policy, any non-conforming product or equipment is quarantined pending review and determination of the submitted NCR, including any corrective actions.



2.4.5.2 Quarantining Non-conforming Product or Equipment

Background Scope:

2.4.5.2 If product/equipment quarantined is not physically possible in our designated hold area, the product or equipment is duly marked with a “**NCR HOLD**” label on its exterior and isolated. The Warehouse Manager and/or the SQF team investigate and determine escalation or disposition, maintaining copies of NCRs and related policies and procedures. Release of the product for use/ sale to a customer shall follow our Policy and be documented after the risk have been discussed, determined and approved by the SSM.

Instructions:

DO NOT remove goods marked as **HOLD** or in a **HOLD** area until instructed by your supervisor or appointed delegate.

Repair or Dispose of any **Non-conforming equipment** in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of the goods stored in the warehouse; All product or equipment disposed of must be documented for traceability.

The following outlines the steps taken to control the process from instigation to closing off of a nonconformance report and the reporting of findings to the food safety team:

- Each non-conformance found shall be recorded on the non-conformance form. All information relevant to the subject shall be included in the spaces provided along with which department the Non-conformance is being directed for disposition.
- In the event that an employee has a question as to what shall be included or to where the nonconformance is to be directed, assistance shall be sought from their direct supervisor.
- The SQF Practitioner receives the NCR and records the non-conformance into the nonconformance data base and/or log, assigning it the next available number and the “date in”. Relevant information should be included as to the type of non-conformance so appropriate department may track for report purposes. If this information is not readily available the SQF Practitioner shall seek assistance to define the type from the initiator.
- The SQF Practitioner follows-up on all non-conformances FIFO except for ones requiring immediate action, this step is to ensure that the departments causing the non-conformance have taken the necessary steps to provide solutions to the problems.
- In the event the SQF Practitioner sees a trend of reoccurrences, a corrective action report is initiated to the responsible department to establish a permanent disposition. This also applies



where the non-conformance is deemed to be significant, further definition of this shall be sought from management and/or the food safety team.

- Upon disposition (i.e. the solution) of each non-conformance the initiating individual shall forward a copy to the SQF Practitioner to log the problem has been solved.
- The SQF Practitioner shall record on the non-conformance log the date of disposition.

2.4.6 Product Recoup

Background Scope:

2.4.6.1 This site does not recoup products. However, in the event, recoup is feasible to salvage acceptable products or for any other reason, they will be performed as follows:

- In designated area, so clearly marked by a visible sign.
- The recoup area shall be separate from other usable materials.
- In minimal amounts, documented and identified in the company traceability records.
- If any recoup process is paused to permit other processing, the break shall be identified in the company process and proper sanitation steps completed and recorded by the Warehouse Manager.

Instructions:

It applies to all personnel authorized to conduct rework when it occurs. The warehouse manager is responsible for rework Personnel when it occur. Rework or recoup is performed to salvage acceptable products or for any other reason they will be performed as follows:

- All recoup/rework is performed in the south bay , isolated from order processing
- The rework area shall be separate from other usable materials
- The amount shall be minimal, documented and identified in the company traceability records
- Should re-work have to stop to allow other processing, the break shall be identified in the company process and a record of adequate sanitation is available.in accordance with 21 CFR and USDA requirements and when species are changed.
- Complete a Transitional Log for all waste resulted from the recoup.



2.4.7 Product Release

Background Scope:

2.4.7.1 Release procedures are an informal part of our normal receiving processes. Receiving, in compliance with procedure (**Procedure: Receipt of Materials**), uses invoices, checklists, and visual inspection to determine if the incoming products are acceptable for distribution to our customers.

2.4.7.2 The Warehouse Manager maintains an active Product Release log, in hard copy form.

Instructions:

Personnel are assigned to perform the following procedure daily during work. The supervisor ensures performance is in accordance with the requirements. Records such as pick sheets, online reporting forms etc. are verified daily by the supervisor.

At each internal audit the auditor signs or initials the audit section verifying that there were no NCR's issued against processing personnel.

The Warehouse Manager is responsible for warehouse personnel.

Incoming materials are inspected by to verify that they are suitable for our customer's. All products stored and distributed meet legislative and food safety requirements, prior to being released for product storage and are found in our receiving and storage of materials procedure 12.6. Work in process such as products staged for the next step of distribution are not subject to a specific release step. The operators performing the next step of their operation are responsible for inspecting the product before passing to the next stage. Products stored in the warehouse awaiting picking and shipping instruction have been released by the put-a-way operators. The pull sheet is signed-off by the delivery person after picking indicating they have performed their activity.

All product releases where documentation is required as a condition of contract, the records are maintained by Inventory Control. Any products that do not conform in any way have a nonconformance initiated against them following procedure 2.4.5.



2.4 APPENDIX: RELATED FORMS & CHARTS

Pull Ticket (Manual Sales Order)

Invoice (QuickBooks)

Hold Signs

Recoup Signs

Waste Signs



2.5.1-.2 System Verification and Activities

Background Scope:

2.5.1.1s: The methods, responsibility and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented.

2.5.2.2s: The methods, responsibility and criteria for verifying monitoring of Good Distribution Practices, critical control points and other food safety controls, and the legality of certified products, shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record. 2.5.2.3s: Records of the verification of monitoring activities shall be maintained.

Instructions:

Verification procedures are outlined in the procedures for each of our pre-requisite programs (13) which outline who is verifying the activity of whom, how often and what method is used to indicate this verification. The verification process is checked during internal audits on each procedure at least annually and after validation the SQF Practitioner shall sign and date the internal audit checklist.

Item	Who	How Often
*PRPs	SQF Practitioner Supervisor	Yearly Daily/ Weekly
CPs	SQF Practitioner	Yearly
Other food safety (HACCP)	SQF Practitioner	Yearly
QA Checklist (Not Mandatory)	SQF Practitioner	Daily
Internal Audits	SQF Practitioner	Yearly

Following is a detailed list of all methodology - **2.5.1-PREREQUISITE & HACCP Verification Chart & Methodology**. And verification – **2.5.2 Verification and Validation Chart** and **2.5.2.3 Verification and Validation Monitoring**. Ensure that the list, responsibility, and frequency are current.

*Prerequisites Programs consist of GSDPs, GSDPs in process, Training, Calibration, Pest Control, Maintenance, Sanitation, Foreign Objects, Supplier, Transport, and Waste & Allergen Management.



2.5.3 Corrective and Preventative Action

Background Scope:

2.5.3.1s: The responsibility and methods outlining how corrections and corrective actions are determined, implemented and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements, shall be documented and implemented.

Common Corrective and Preventative Action Misconceptions

There are three common misconceptions about corrective and preventive action:

1. The standard calls for documenting every occurrence of non-conformity.
2. A preventive action is really just calling a corrective action something different.
3. The major reengineering of a process, product or service, or the introduction of a new process or equipment, is not a candidate for preventive action documentation.

Corrective vs. Preventative Action

A Corrective Action is when a low risk non-conformance repeatedly occurs has either repeatedly happened or a risk to food safety non-compliance occurs.

A Preventative Action is observing during daily pre-op or internal audit an action that is NOT YET A NON-CONFORMANCE but if not addressed COULD/WILL become one.

For example: if you see a warehouse employee about to enter the warehouse with food, a Preventative Action is verbally reminding the employee of the warehouse food policy. Write up a Preventative Action report, outlining the area of concern, the immediate correction taken, and for this instance, inform the supervisor and require 2 hours training for the employee.



Instructions:

Corrective Action GENERAL

GUIDELINE

- In the event of recurrence, a serious non-conformance will initiate a formal Corrective and Preventive Action report who shall request a proposed permanent solution to the nonconformance
- By monitoring the effect of NCRs and Corrective Actions, the Practitioner is better qualified to report the findings and modifications to the Management for review. Whenever a CAR is raised, prep records are reviewed.
- The SQF Practitioner reviews the following records which reveal conditions adverse to quality:
 - Non-conformance Reports
 - Field and service complaints
 - Customer complaints
 - Internal Audit findings
- Corrective Action Reports are completed and distributed to the appropriate departments for review and analysis.
- In case of a significant condition adverse to food safety, the SQF Practitioner, in conjunction with the respective Manager, determines the corrective action to be taken.
- The SQF Practitioner is responsible to audit the implementation of the corrective action and its effectiveness.
- The identification, cause and planned corrective action and the results of the audit are reported to the SQF Team Leader for review, analysis and feedback.
- If there are any corrective actions, create log and maintain for the year.



Instructions:

Familiarize yourself with the GSDP. Throughout your day, remain alert to potential violations and upon witnessing, complete the Preventative Action Report. Forward to the Practitioner for review and approval prior to issuing to the employee



2.5.5 Internal Audits and Inspections (M)

Background Scope:

2.5.5.1s: The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted at least annually.

The Warehouse Manager conducts regular, unscheduled internal audits to test the SQF system, document areas of success, and develops action plans for any areas needing improvement; reporting findings and results at monthly safety meetings. Further, periodic customer and employee satisfaction surveys, compiles real time data of both our food safety and service to customer and employee alike.

Instructions:

The Warehouse Manager audits various sections of the policy and procedures of the site's safety manual. The elements chosen are based on a rotation and/or whenever there is a critical area requires an audit due to NCRs/ CARs, or those requiring follow-up audits as a result of changes to procedures. The questionnaire used was developed by the company to reflect its processes. The scores for each question are rated: 0 - non-conforming, 1- satisfactory/ needs improvement and 2 - acceptable/no improvement required, and 3 - goes beyond regulation, customer, and company objectives and goals. The totals for each section audited is compiled and then converted to a percentage. The percentage is placed in the measure column, the "actual/target" difference given the appropriate signal on the scorecard compilation sheet.





2.6.1 Product Identification (M) Background

Scope:

2.6.1.1s: The methods and responsibility for identifying products during all stages of storage shall be documented and implemented. The product identification system shall be implemented to ensure:

- i. Proper stock rotation; and
- ii. Accurate location of product.

Instructions:

Proper product identification requires proper receiving, stock rotation, and storage location tracking. Comply with you OTJ.

RECEIVING

All products in storage, including work in progress, must comply with proper FIFO stock rotation and warehouse location synced with that in the QuickBooks (QB):

- 1) When receiving inventory, check that each pallet and case include proper Original manufacturer's labels
- 2) If the item is in stock, move existing inventory FORWARD and stock new inventory BEHIND (FIFO)
- 3) If item is in a new location, note new location on receiving bill so that it may be updated in QB 4)
All receiving, bills, invoices, and slips are stamped and all stamp information completed:
 - a. Date Received
 - b. Lot Number (Julian Date Reversed – see warehouse desk calendar)
 - c. # of Pieces – If you do not accept the entire load, you must write the number accepted.
 - d. Received By – Write your first name or initials
- 5) Place completed receipt in the Warehouse Receiving Folder on warehouse desk.
- 6) **DO NOT DELIVER DIRECTLY TO ACCOUNTING. ALL ITEMS MUST BE RECEIVED BEFORE PAYMENT PROCESSING.**

STOCK ROTATION

The supervisor is responsible to train personnel to recognized product label identification to maintain first in first put principles.

“First In, First Out” (FIFO)

FIFO ensures the product used is the earliest one received or in the case of packaged goods, the earliest expiry date known as “First Expired, First Out” (FEFO).

FIFO Exceptions:

Only customer's specifications may override, i.e.; product specifically brought in for a customer or other reason, such as quality (ripeness, color, texture, size).



Before storing in-coming product, the present/current inventory is shifted out and forward, moving the oldest dated product to the front of the storage area so that pickers can easily access product. In the event of large volumes of product, leave sufficient space to access and view product lot numbers.

FOLLOW LOT NUMBER. PICK LARGEST NUMBER (350 is older than 341).

Pickers use the same principle as above in picking for processed goods oldest date first. Verification of FIFO process is done during inventory counts conducted on a repetitive but unscheduled routine.

PRODUCT LOCATION

Our warehouse storage is partition by temperature for storage requirements. For the size of our warehouse, this permits easy stock rotation and isolation when necessary. After receiving completes inspection and documentation (the receiving stamp is applied to each receiving document, e.g. invoice, receipt, BOL), each item receives a lot number. When the same product is ordered from more than one vendor, the lot number will also include an abbreviation for the vendor.

The corresponding product lot number is logged on the receiving stamp on each receipt and in QuickBooks. Both serve as product locators for withdrawals, recalls, and inspection.

Lot Numbers

All products are identified by a lot number on their boxes, bags, crates, skids or totes upon receipt. This code has been established as the receiving date of the product i.e.; January 1st equates to 365 (the day of the year, or 366 in leap year).

They also may have a manufacturer's expiry date. In this case, with choosing FIFO, the oldest date overrides receiving dates. Regardless of printed information, all packages MUST have a lot number. Both are used to verify vendor product quality.



Lot Numbers in QuickBooks

If you need to track a product:

1. Convert the lot number into a Calendar Date
2. Open and log into QuickBooks
 - a. Open Inventory Center
 - b. Enter product name in search window
 - c. Scroll the transaction for the date (entries may be “Bill” or “Item Receipt”)
 - i. Double-click your selected transaction

The entry will reveal corresponding lot number for all items received on that bill, including origin and original size and count

You may also search by Vendor or in the question of a customer query, by the Customer’s account.





2.6.2 Product Trace (M) Background

Scope:

2.6.2.1s: The responsibility and methods used to trace product shall be documented and implemented.

If problems occur, during distribution or at with the customer, we have all the information we need to carry out a full inspection and where possible prevent re-occurrence.

Instructions:

- 1) All products must be traceable both in QB and hard copy files:
- 2) All product received must be entered in QB.
- 3) All products are sold through QB, including donations, and employee purchases.

Product Use	Form	Invoice?	Credit/ Memo?
Donations	Pull Ticket	✓	✓
Employees	Pull Ticket	✓	✓
Disposal	Product Transition	✓	✓
Returns	Edit Existing invoice	✓	✓
Farm/Animal	Product Transition	✓	✓
Withdrawal Notice	Product Transition, NCR, CA	✓	✓
Recall Notice	Product Transition, NCR, CA	✓	✓

Each product is identified by our lot number on the product itself or master carton. This lot number lets the product be traced back to their batch, by its delivery date, customer purchase order, and bill of lading (Hard copy).

The Customer Service personnel are responsible for communicating the above information in the event of a customer call from the field.

Records are randomly reviewed. Records are reviewed entirely monthly (2.6.2.2) for accuracy.



2.6.3 Product Withdrawal and Recall (Mandatory)

Background Scope:

2.6.3.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented.

The purpose of this procedure is to outline how Twin City handles recall of product after it has been distributed to customers.

It applies to Travis Sharum, President, Team Leader, Tiffany Webb, SQF Practitioner, and Warehouse Manager, Bruce Kalinowinski:

Travis Sharum Bus: (479) 756-6338	Tiffany Webb: Bus: (479) 283-3543	Bruce Kalinowinski: Bus: (479) 756-6338
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The SQF Team Leader and Warehouse Manager are responsible for training personnel to ensure all steps related to a recall of product are performed immediately upon notification by health authorities or otherwise.

The personnel responsible for conducting the product recall are the SQF Practitioner and their trained designates

Instructions:

Definitions:

Class I recall: is a situation in which there is a reasonable probability that the use of, or exposure to, a volatile product will cause serious health consequences or death.

Class II recall: is a situation in which the use of, or exposure to, a volatile product may cause temporary adverse health consequences or where the probability of serious adverse health consequences is remote.

Class III recall: is a situation in which the use of, or exposure to, a volatile product is not likely to cause adverse health consequences.

**Recall Action Steps:**

- **First notify SQFI and the certification body at foodsafetycrisis@sqfi.com and recalls@asifood.com.**
- Upon notification of concern regardless of Class, the individual receiving the notification shall immediately complete the company recall notification form. Specifically the arrival date and description of the product.
- Compare the receipt date in QuickBooks to the recall notice to confirm it is valid.
- If the recall is deemed to be a Class I or Class II, immediately contact the local inspector or USDA Regional Manager advising of the recall notice.
- Query QuickBooks for all purchasing customers of the subject product.
- Launch QuickBooks/Inventory Center/Item Search. This will provide all transactions related to the item. Set range within that of the recall notice. Print a copy of each invoice to include with the recall packet.
- If there is a need for expert advice, notify the SSM.
- In the event that media is involved all questions will be handled by our SSM and Practitioner under advisement.
- The records of distribution for the subject product shall be recovered from the companies pick/ship computer records, checked to see if there were any abnormalities and that compliance to the requirements were met. An immediate inventory of the product from that date and segregate from other goods.
- Clearly identified “NOT TO BE SHIPPED UNTIL FURTHER NOTICE” the amount in stock shall be recorded on the recall notification form along with the totals produced and shipped.
- If deemed necessary by the local inspector all returned products shall be destroyed.
- If deemed acceptable by the local inspector subject product may continue to be sold after specific corrective action has been conducted by the company.
- In all events whether a recall is deemed necessary or not the individual shall initiate a corrective action (see nonconforming product & corrective action section).



- Complete the recall notification packet, including notifying customers to destroy and request credits, vendors to request credit for disposed product. Notify the initiating party upon conclusion.
- File Recall Packet with Practitioner.
- The company conducts a simulation of this recall process on a semi-annual basis and deems the process effective (see sample simulation documentation). After the mock recall is complete a review of outcomes will be held during our quarterly meetings. In the event that a meeting is required sooner an emergency meeting will be called.



Instructions:

First, determine if the product is a withdrawal or recall. Withdrawal: retailers removing but not contacting consumers. Recall: public notices, telling consumers etc.

Withdrawal:

If a withdrawal notice is received, the following steps happen simultaneously:

WAREHOUSE	OFFICE
<ol style="list-style-type: none"> 1) Identify product 2) Confirm correct product (FIFO and Lot#) 3) Pull all remaining product 4) Count all remaining product 5) Complete Product Transition Form <ol style="list-style-type: none"> a. Check Withdrawal under Purpose b. Get another employee to sign 6) Put Completed form in file 7) Bag and dispose of product 8) Notify OFFICE when complete 	<ol style="list-style-type: none"> 1. Notify SQFI and the certification body at foodsafetycrisis@sqfi.com and recalls@asifood.com. 2. Identify product 3. Confirm correct product (FIFO and Lot#) 4. Generate an Invoice to “Withdrawal” (customer name) 5. “Sale” the total count of withdrawal inventory 6. ZZ- credit the total invoice 7. Print invoice and attach to Product Transition Form 8. Prepare Withdrawal File: <ol style="list-style-type: none"> a. Print out notice b. Warehouse Paperwork c. Office Paperwork d. Complete NCR and CA if needed <ol style="list-style-type: none"> i. Indicate Root Cause e. File in SQF: Product Withdrawals

No other action ²is required under voluntary withdrawal of product.



Recall:

If a safety recall notice is received, follow the steps of the list below:

WAREHOUSE	OFFICE
<ol style="list-style-type: none"> 1) Pull all remaining product on the recall 2) Count all remaining product on the recall 3) Complete Product Transition Form <ol style="list-style-type: none"> a. Check Recall under Purpose b. Form requires 2 signatures 4) Bag and dispose of product 5) Notify OFFICE when complete 	<ol style="list-style-type: none"> 1) Notify SQFI and the certification body at foodsafetycrisis@sqfi.com and recalls@asifood.com. 2) Query QB for the item sales 3) Run and print the sales report 4) Generate notification per customer’s preference <ol style="list-style-type: none"> a. Check whether email or phone b. If phone, note on form time and person receiving verbal notice 5) Issue credit to customers for sold items 6) Request credit from Vendor: 7) Find original receiving invoice 8) Total line item 9) Include qty and total 10) Prepare Recall File: <ol style="list-style-type: none"> f. Printout recall notice g. Copy Warehouse Paperwork h. Copy Office Paperwork i. Complete NCR and CA if needed <ol style="list-style-type: none"> i. Indicate Root Cause j. File in SQF: Product Recalls 9. Determine SQFI notification: 10. Is the Recall a Class 1 or 2? Yes: <ol style="list-style-type: none"> a. Notify SQFI (email: foodsafetycrisis@sqfi.com)

QuickBooks Cheat Sheets:

All inventory received and entered into QuickBooks is traceable from Supplier, Storage Duration, to Customer sale.

Even if you are not proficient in QuickBooks, with the following screenshots you can find invoices, vendor information and inventory information.



QUICKBOOKS SCREENSHOT: CUSTOMER INVOICE WITH ITEM AND LOT

INVOICE See History

CUSTOMER JOB: MI TIENDA SUPERMARKET EXPRESS
ACCOUNT: ACCOUNT RECEIVABLE
TEMPLATE: TWC INVOICE

DATE: 03/26/2020
INVOICE #: 463010

BILL TO: MI TIENDA SUPERMARKE
1505 E. ROBINSON
SPRINGDALE, AR 72766

SHIP TO: MI TIENDA SUPERMARKE
1505 E. ROBINSON
SPRINGDALE, AR 72766

TERMS: Weekly
DUE DATE: 04/02/2020
PRICE RULE: S3

QUANTITY	FULL ITEM	DESCRIPTION	LOT NUMBER	RATE	AMOUNT	TAX
2	P-PINCS06-01	PINEAPPLES 7CT	300	19.00	38.00	Non
2	P-WATSS006-01	WATERMELONS 6CT PERSONAL	296	10.00	20.00	Non

QUICKBOOKS SCREENSHOT: VENDOR SEARCH BY LOT THEN INVENTORY

Vendor Information

Company Name: NOGALES PRODUCE, INC. Main Phone: 214-275-3500
Full Name: FRANK Fax: 214-275-3530
Vendor Type: Suppliers
Billed From: NOGALES PRODUCE, INC.
8220 FORNEY ROAD
DALLAS, TX 75227

REPORTS FOR THIS VENDOR
QuickReport
Open Balance

Transactions

TYPE	NUM	DATE	MEMO	ACCOUNT	AMOUNT
Check	19471	03/24/2020		CHECKING-ARVEST ...	-4,673.55
Check	19461	03/20/2020		CHECKING-ARVEST ...	-8,056.33
Check	19455	03/17/2020		CHECKING-ARVEST ...	-7,864.84
Check	19446	03/13/2020		CHECKING-ARVEST ...	-4,169.04
Check	19440	03/10/2020		CHECKING-ARVEST ...	-3,532.91
Check	19431	03/06/2020	VOID:	CHECKING-ARVEST ...	0.00
Bill	11814047	03/06/2020		Accounts Payable	-1,604.44
Bill	11814048	03/06/2020		Accounts Payable	-2,492.75
Bill	11814053	03/06/2020		Accounts Payable	-35.50
Bill	11614037	03/06/2020		Accounts Payable	-1,187.50
Bill	11814039	03/06/2020		Accounts Payable	-1,637.50
Bill Pmt-Check	19431	03/06/2020		CHECKING-ARVEST ...	-6,957.69
Check	19424	03/03/2020	VOID:	CHECKING-ARVEST ...	0.00
Bill	11612284	03/03/2020		Accounts Payable	-1,053.87
Bill	11812288	03/03/2020		Accounts Payable	-1,083.00
Bill Pmt-Check	19424	03/03/2020		CHECKING-ARVEST ...	-2,116.87
Check	19408	02/28/2020	VOID:	CHECKING-ARVEST ...	0.00
Bill	11810846	02/28/2020		Accounts Payable	-427.50
Bill	11810852	02/28/2020		Accounts Payable	-1,288.18



QUICKBOOKS SCREENSHOT: INVENTORY SEARCH BY VENDOR THEN LOT

TwinCityProduce 2020 - Intuit QuickBooks Enterprise Solutions: Manufacturing and Wholesale 19.0(multi-user)(TCPTECH) - [Inventory Center: P-LETIC030C-01]

File Edit View Lists Favorites Mfg & Whse Company Customers Vendors Employees Inventory Banking Reports Window Help

New Inventory Item... New Transactions... Print... Excel...

Active Inventory, Assembly

NAME	PURCHASE DESCRIPTION	PRICE	QUANTI
CN-CKNSH0079-12	KNORR SHRIMP 12/7 9OZ	39.50	0
CN-CKNSHC048-01	KNORR SHRIMP CUBES 48OZ	56.85	0
CN-CKNT00035-06	KNORR TOMATO 8/25 OZ	35.50	-1
CN-LAMOAL20-7	LAMODERNAALPHABET 20-7OZ	8.75	0
CN-LAMOFI20-7	LAMODERNAFIDEO 20-7OZ	8.75	1
CY-LRCAJA014-01	LAROSA CACAHUATE JAPONES 14CT	3.50	-3
CY-LRCAP004-01	LAROSA PINATAMIX 4LB	8.25	0
CN-LAAR001-24	LARD (ARMOUR) 24/1LB	37.50	0
CN-LAAR006-04	LARD (ARMOUR) 4/8LB	50.00	0
CN-LAAR004-12	LARD (ARMOUR)12/4 LB	67.85	0
CN-LA0050-01	LARD 50 LB	48.75	6
CN-LECO014-24	LECHERA CONDENSADA 24/14	52.50	8
P-LEBH012-01	LEEKS 12 BUNCH	27.00	-5.5
P-LECS115-01	LEMONS 115CT	39.00	-181.5
P-LECS140-01	LEMONS 140CT	39.00	315
P-LECS165-01	LEMONS 165 CT	39.00	-188.5
P-LECS002-18	LEMONS 18/2LB	36.00	0
P-LECS200-01	LEMONS 200CT	39.00	0
X-XLECS000-EA	LEMONS EACH	0.55	2,004
X-XLECS000-LB	LEMONS PER LB	1.75	86.5
DG-LEDR05-01	LENTILS (DRY) 50LB (LENTEJAS)	46.00	0
P-LETB012-01	LETTUCE BUTTER HYDRO 12 CT	27.00	0
P-LETIC024C-01	LETTUCE ICEBERG (CELLO) 24 CT	39.50	-716
X-XLEICE24-01	LETTUCE ICEBERG (CELLO) EACH	1.75	-445
P-LETIC024-01	LETTUCE ICEBERG 24 CT	39.50	-23
P-LETIC030C-01	LETTUCE ICEBERG CELLO (30CT)	18.00	100
X-XLEIC000-EA	LETTUCE ICEBERG EACH	2.00	-242
P-LETLEGR24-01	LETTUCE LEAF GREEN CASE	34.00	-55

Inventory Information

Name: **LETIC030C-01** Reorder Pt (Min): 0

Description: LETTUCE ICEBERG CELLO (30CT)

Preferred Vendor: Max: Quantity On Hand: 100

Unit of Measure: Quantity on Sales Orders: 0

Mfg Part No: LETIC030C-01 Quantity on Pos: 0

Calculated Average: 19.05 Reserved for Assemblies: 0

Cost: 18.75 Save Sales Price: 18.00 Revert Quantity Available: 100

Markup: 1.25

Margin: 6.94%

REPORTS: QuickReport, Physical Inventory V, Stock Status, Inventory Valuation S, Where Used (in Ass), Negative Inventory L, Show Price Rules

Recall Information: Quantity on Hand by

Transactions Notes

SHOW: All Transa... FILTER BY: All DATE: All

TYPE	NUM	DATE	CUSTOMER	MEMO	ACCOUNT	AMOUNT
Bill	531933	03/17/2020	MCNEWS PRODUCE	LETTUCE ICEBERG CEL...	Inventory As...	900.00
Bill	529337	02/18/2020	MCNEWS PRODUCE	LETTUCE ICEBERG CEL...	Inventory As...	1,005.00

Manage Transactions Run Reports



2.7 Food Defense and Food Fraud

2.7.1 Food Fraud Vulnerability Assessment/ Food Defense Plan (M) Background

Scope:

2.7.1.1s: The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident shall be documented, implemented and maintained.

2.7.1.2s: A food defense plan shall include:

- i. The name of the senior site management person responsible for food defense; ii. The methods implemented to ensure only authorized personnel have access to operational equipment, vehicles, and storage areas through designated access points;
- iii. The methods implemented to protect sensitive processing points from intentional adulteration;
- iv. The measures taken to ensure the secure receipt and storage of raw materials, packaging, equipment and hazardous chemicals;
- v. The measures implemented to ensure products and materials are held under secure storage and transportation conditions; and
- vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

Instructions:

See Plan in the Policy Binder

Food Defense Plan

Table of Contents

- I. RECOMMENDED ACTIONS
 - A. Management
 1. Preparing for tampering or other malicious, criminal, or terrorist actions.
 2. Supervision
 3. Recall Strategy
 4. Investigation of Suspicious Activity
 5. Evaluation Program
 - B. Human Element - Staff
 1. Screening (pre-hiring, at hiring, post-hiring)
 2. Daily Work Assignments
 3. Identification
 4. Restricted Access
 5. Personal Items
 6. Training in Food Security Procedures
 7. Unusual Behavior
 8. Staff Health



- C. Human Element - Public
 - 1. Visitors (for example, contractors, supplier representatives, delivery drivers, customers, couriers, pest control representatives, third party auditors, regulators, reporters, tours)
- D. Site
 - 1. Physical Security
 - 2. Storage and Use of Poisonous and Toxic Chemicals (e.g. cleaning and sanitizing)
- E. Operations
 - 1. Incoming Materials and Contract Operations
 - 2. Storage
 - 3. Security of Water and Utilities
 - 4. Finished Products
 - 5. Mail Packages
 - 6. Access to Computer Systems

I. Food Defense Actions

A. Management 1. **Preparing for the possibility of tampering or other malicious, criminal, or terrorist actions.**

- Our Food Defense Team (SSM and Warehouse Manager) is knowledgeable in food defense matters and have the responsibility for Twin City's security.
- Our internal assessment of our food security protocol is available with the SSM's approval.
- Our security strategy prepares us for handling and responding to tampering and other malicious, criminal, or terrorist actions, both threats and actual events, including identifying, segregating and securing affected product/s
- Our emergency evacuation plan, including preventing security breaches during evacuation is tested and in place. Copies are available from the SQF Practitioner.
- Our Crisis Management Plan fulfills the following statements:
 - We maintain our floor and flow plan electronically which is secure and retrievable by authorized personnel (SSM, Warehouse Manager, and Practitioner)
 - Our emergency evacuation plan outlines emergency response first contacts ○ Our management is aware of 24-hour contact information for all levels of first responders. The homeland security agencies are in our Bioterrorism application
 - Names and contact numbers of whom in management should be alerted of any potential security problems (24-hour contacts)
- Our initial and ongoing training promote food security awareness to encourage all staff to be alert to any signs of tampering or other malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions, and reporting any findings to identified management
- We inform and update staff about relevant security issues via our "Communications Board" which is a combination of phone, written, text, and in person notification.



- Our strategy policy for communicating with the public (for example, identifying a media spokesperson, preparing generic press statements and background information, and coordinating press statements with appropriate authorities) is controlled by and conducted by our Senior Site Manager and Practitioner

2. Supervision

- We provide supervision to all staff, including cleaning and maintenance staff, contract workers, data entry and computer support staff, and especially, new staff outlined in our SOP's at all activity levels
- We conduct routine security checks of the premises, including automated manufacturing lines, utilities and critical computer data systems (at a frequency appropriate to the operation) for signs of tampering or malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions. This checklist is conducted monthly by our Food safety and annually during our vulnerability review

3. Recall Strategy

- Our Recall SOP found in our Manual identifies the person responsible, and their backup.
- Our Recall forms as part of our Recall SOP provides the direction for proper handling and disposition of recalled product
- Our customers and contacts, addresses and phone numbers list is found on our administration computer and secure and protected through Computer connected to Head Office 4.

Investigation of Suspicious Activity

- As part of our Recall SOP we would investigate threats or information about signs of tampering or other malicious, criminal, or terrorist actions
- As part of our monthly food safety check we would alert appropriate law enforcement and public health authorities about any threats of or suspected tampering or other malicious, criminal, or terrorist actions found

5. Evaluation Program

- Should an event occur we would evaluate what we have learned as a result of a tampering or other malicious, criminal, or terrorist actions and threats
- As part of our annual Food Defence meeting we review and verify, , the effectiveness of our security management program (for example, using knowledgeable in-house or third party staff to conduct tampering or other malicious, criminal, or terrorist action exercises and mock recalls and to challenge computer security systems), revising the program accordingly, and keeping this information confidential
- During our monthly food safety inspection we perform random food security inspections of all appropriate areas of the site (including receiving and warehousing, where applicable) as outlined in our food safety checklist
- During our annual Food Defence meeting we verifying that our Alarm Company and the security camera system have done an appropriate job, We do not have a security contractor



B. Human Element - Staff

Under US Federal law which we comply to as a food exporter from Canada to the US, we are required to verify the employment eligibility of all new hires, in accordance with the requirements of the Immigration and Nationality Act, by completing the INS Employment Eligibility Verification Form (INS Form I-9). Completion of Form I-9 for new hires is required by 8 USC 1324a and non-discrimination provisions governing the verification process are set forth at 8 USC 1324b. and is conducted in accordance with Canadian law

1. Screening (pre-hiring, at hiring, post-hiring)

- We examine the background of all staff (including seasonal, temporary, contract) employing the services of an outside contractor. Those hired directly through a employment services firm are screened prior to delivery by that firm) as appropriate to their position, considering candidates' access to sensitive areas of the site and the degree to which they will be supervised and other relevant factors (for example, obtaining and verifying work references, addresses, and phone numbers, Note: screening procedures should be applied equally to all staff, regardless of race, national origin, religion, and citizenship or immigration status. **2. Daily Work Assignments**
- The supervisor knows who is and who should be on premises, and where they should be located, for each shift
- This information is kept up to date by the supervisor and updated accordingly

3. Identification

- Our system of positive identification and recognition is appropriate to the nature of the workforce (for example, issuing uniforms, and, color coded by area of authorized access), when appropriate
- When a staff member is no longer associated with the establishment we collect the uniforms,

4. Restricted Access

- All staff that require unlimited access to all areas of the site are identified by their supervisor
- We reassess levels of access for all staff periodically
- All limited access areas are identified by signs posted on the entry doors, e.g; access to authorized personnel
- We evaluate whether changing combinations, rekeying locks and/or collecting the retired key card when a staff member who is in possession of these is no longer associated with the establishment if necessary, and additionally as needed to maintain security

5. Personal Items

- restricting the type of personal items allowed in establishment is part of our Personal Hygiene SOP



- Only personal use medicines that are necessary for the health of staff are permitted and these personal use medicines must be properly labeled and stored away from food handling or storage areas is part of our Personal Hygiene SOP
- preventing staff from bringing personal items (for example, lunch containers, purses) into food handling or storage areas is part of our Personal Hygiene SOP



6. Training in Food Security Procedures

- We incorporate food security awareness, including information on how to prevent, detect, and respond to tampering or other malicious actions or threats, into staff training programs, including temporary and volunteer
- Provide periodic security reminders (for example, scheduling meetings, post on our communication board located in the employee lunchroom)
- We encourage staff support (for example, involving staff in food security planning and the food security awareness program, demonstrating the importance of security procedures to the staff which are posted on the communications board located in the employee lunchroom)

7. Unusual Behavior

- All employees are made aware to watch for unusual or suspicious behavior by staff (for example, staff who, without an identifiable purpose, stay unusually late after the end of their shift, arrive unusually early, access files/information/areas of the site outside of the areas of their responsibility; remove documents from the site; ask questions on sensitive subjects; bring cameras to work)

8. Staff Health

- All employees are made aware to watch for atypical staff health conditions that staff may voluntarily report and absences that could be an early indicator of tampering or other malicious, criminal, or terrorist actions (for example, an unusual number of staff who work in the same part of the site reporting similar symptoms within a short time frame), and reporting such conditions to local health authorities

C. Human Element - Public

1. Visitors (for example, contractors, supplier representatives, delivery drivers, customers, couriers, pest control representatives, third-party auditors, regulators, reporters, tours)

- Our camera surveillance system records incoming and outgoing vehicles, We do not check packages and briefcases for suspicious, inappropriate or unusual items or activity
- Our access SOP includes restricting entry to the establishment (for example, checking visitors in and out at security or reception, requiring proof of identity, issuing visitors badges that are collected upon departure, accompanying visitors)
- Our access SOP ensures that there is a valid reason for the visit before providing access to the site – All employees have been trained to be aware of unsolicited visitors
- Our access SOP verifies the identity of unknown visitors
- Visitors have restricted access to food handling and storage areas unless they are otherwise specifically authorized and accompanied)
- Our locker area is under constant surveillance



D. Site

1. Physical Security

- The rear tanker delivery area perimeter is surrounded by fencing and under camera surveillance
- All doors are secured (including freight loading doors, when not in use and not being monitored, and emergency exits), roof openings/hatches, vent openings, ventilation systems, utility rooms, storage rooms, loft areas, trailer bodies, tanker trucks, railcars, and bulk storage tanks for liquids and solids, to the extent possible using locks, and are, monitored by our video surveillance
- All exterior doors are metal and kept locked at all times and in particular when the site is not in operation, except where visibility from public thoroughfares is an intended deterrent minimizing the number of entrances to restricted areas
- All bulk unloading equipment is secured (for example, augers, pipes, conveyor belts, and hoses) when not in use and receiving inspects the equipment before use
- The HR Manager is responsible for accounting for all keys to establishment (for example, assigning responsibility for issuing, tracking, and retrieving keys)
- Each week we monitor the security camera tapes of the premises
- During our monthly food safety checks we examine to the extent practical, places that can be used to temporarily hide intentional contaminants (for example, minimizing nooks and crannies, false ceilings)
- All interior and exterior lighting, including emergency lighting, are at adequate levels for their intended use where appropriate, to facilitate detection of suspicious or unusual activities
- Our security camera system is used to control vehicles authorized to park on the premises
- Our parking areas are separated from entrances to food storage and processing areas and utilities.

2. Storage and Use of Poisonous and Toxic Chemicals (for example, cleaning and sanitizing agents)

- We do not store or use any poisonous and toxic chemicals except those that are required for the operation and maintenance of the site
- We store all poisonous and toxic chemicals as far away from food handling and storage areas.
- Access to secured storage areas for poisonous and toxic chemicals is limited and all entries have “authorized personnel” signage posted
- All poisonous and toxic chemicals are properly labelled in accordance with our Chemical Storage SOP



E. Operations

1. Incoming Materials and Contract Operations

- Only purchase from known, appropriately licensed or permitted sources for all incoming materials, including sanitation, packaging, and labels.
- Take reasonable steps to ensure that suppliers and transporters practice food security measures (e.g., food security measures, letters of credit, or vendor approval program)
- Receiving reviews labeling and packaging configuration for tampering and expiration dates
- Receiving reviews and checks locked/sealed vehicles and obtaining the seal number from the supplier, if needed for the chain of command from farm to door
- Ensure the transport company has the capability to verify the “live” location of the load
- We do not accept unexplained, unscheduled deliveries or drivers and investigate delayed or missed shipments
- Warehouse staff supervise off-loading of incoming materials, including off-hour deliveries
- Receiving reconciles the product and quantity received to that ordered
- Receiving reviews, checks and investigates shipping documents with suspicious alterations •
Receiving inspects ALL incoming materials for signs of tampering, contamination or damage (e.g., abnormal stains or odors, or tamper-evident packaging) or "counterfeiting" (e.g., inappropriate or mismatched product identity), as part of our Receiving SOP
- Receiving rejects suspect food as part of our Receiving SOP
- If necessary warehouse staff will alert appropriate law enforcement and public health authorities about evidence of tampering, "counterfeiting" or other malicious action

2. Storage

- Our receiving SOP has provisions for receiving, storing, and handling distressed, damaged, returned, and rework products that minimizes their potential for being compromised or to compromise the security of other products (for example, destroying products that are unfit for human or animal consumption, products with illegible codes, products of questionable origin, and products returned by customers NOT clearing inspection)
- We keep track of incoming materials and materials in use, including salvage products, rework products, and product returns as part of our Computer system
- We will investigate stock irregularities outside a normal range of variability and report unresolved problems to appropriate law enforcement and public health authorities
- We do not produce/match manufacturer product labels
- We do not reuse of containers, shipping packages, cartons, etc.,

3. Security of Water and Utilities

- We do not use water in any of our food or product storage and handling.
- We do not identify alternate sources of potable water for use during emergency situations where normal water systems have been compromised.



4. Finished Products

- We do not use public storage warehousing and shipping operations
- Perform random inspection of storage site and vehicles
- Should product tampering occur we would backtrack the product to the supplier and determine severity based on terrorist actions in our Packaging SOP's
- Warehouse staff handle order pickups, and checks unexplained, unscheduled pickups
- We keep track of products through our Computer system
- Should they occur we would investigate stock irregularities outside a normal range of variation and alert appropriate law enforcement and public health authorities about unresolved problems
- All staff remain on the lookout for counterfeit products and know to alert management if any problems are detected

5. Mail Packages

- Administration is responsible to ensure the security of incoming mail and packages

6. Access to Computer Systems

- Access to computer process control systems and critical data systems is restricted to those with appropriate clearance, using ID at log in and is controlled by head office IT
- IT removes employee computer access when no longer associated with the company
- IT established a system of traceability of computer transactions
- Reviewing the adequacy of virus protection systems and procedures for backing up critical computer based data systems is a function of IT
- Validating the computer security system is a function of IT

Emergency Point of Contact:

U.S. Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857
301-443-1240

Note: If a food establishment operator suspects that any FDA regulated products have been subject to tampering, "counterfeiting," or other malicious, criminal, or terrorist action, FDA recommends that he/she notify the FDA 24-hour emergency number at 301-443-1240 or call their local FDA District Office.



Appendix: Food Defense Self-Assessment Questionnaire

Mark each item either Y (Yes), N (No), N/A (Not Applicable or Don't Know)

Operations:

Management

- Y N N/A Don't know - Prepare for the possibility of tampering or other malicious, criminal, or terrorist actions
- Y N N/A Don't know - Assign security responsibility to knowledgeable individual(s)
- Y N N/A Don't know - Conduct an initial assessment of food security procedures and operations
- Y N N/A Don't know - Have a security management strategy to prepare for and respond to tampering and other malicious, criminal, or terrorist actions, both threats and actual events, including identifying, segregating and securing affected product
- Y N N/A Don't know - Plan for emergency evacuation, including preventing security breaches during evacuation
- Y N N/A Don't know - Maintain any floor or flow plan in a secure, off-site location
- Y N N/A Don't know - Learn the community emergency response system in the
- Y N N/A Don't know - Make management aware of 24-hour contact information for local, state, and federal police/fire/rescue/health/homeland security agencies
- Y N N/A Don't know - Make staff aware of who in management they should alert about potential security problems (24-hour contacts)
- Y N N/A Don't know - Promote food security awareness to encourage all staff to be alert to any signs of tampering or other malicious, criminal, or terrorist actions or areas that may be vulnerable to such actions, and reporting any findings to management
- Y N N/A Don't know - Have an internal communication system to inform and update staff about relevant security issues
- Y N N/A Don't know - Have a strategy for communicating with the public



Supervision

- Y N N/A Don't know - Provide an appropriate level of supervision to all staff, including cleaning and office staff, and especially new staff.
- Y N N/A Don't know - Conduct routine security checks of the premises, including, utilities and critical computer data systems for signs of tampering or areas of vulnerability.

Recall Strategy

- Y N N/A Don't know - • Identify the person responsible, and a backup person
- Y N N/A Don't know - • Provide for proper handling & disposition of product
- Y N N/A Don't know - • Identify customer contacts, addresses and phone numbers

Investigation of Suspicious Activity

- Y N N/A Don't know - • Investigate threats or information about signs of tampering
- Y N N/A Don't know - Alert appropriate law enforcement and public health authorities about any threats of or suspected tampering or other malicious, criminal, or terrorist actions

Evaluation Program

- Y N N/A Don't know - Evaluate the lessons learned from past tampering or other malicious, criminal, or terrorist actions and threats
- Y N N/A Don't know - Annually review and verify the effectiveness of the security management program, revise the program accordingly
- Y N N/A Don't know - Perform random food security inspections of all appropriate areas of the site (including receiving and warehousing) using knowledgeable in-house staff
- Y N N/A Don't know - Verify that security contractors are doing an appropriate job, when applicable

Human Element - Staff



Screening (Pre-hiring, at hiring, post hiring)

- Y N N/A Don't know - Examine the background of all staff by position, considering candidates' access to sensitive site areas and the degree to which they will be supervised.

Daily Work Assignments

- Y N N/A Don't know - Know who is and who should be on premises, and where they should be located, for each shift

Identification

- Y N N/A Don't know - Establish a system of positive identification and recognition that is appropriate to the nature of the workforce, when appropriate
- Y N N/A Don't know - Collect company issued property when a staff member is no longer with the company

Restricted Access

- Y N N/A Don't know - Identify staff with unlimited access to all areas of the site
- Y N N/A Don't know - Reassess levels of access for all staff periodically
- Periodically change combinations, codes, and passwords

Personal items

- Y N N/A Don't know - Restrict the type of personal items allowed in establishment
- Allow only personal use medicines that are necessary for the health of staff and ensure they are properly labeled and stored
 Y N N/A Don't know - Prevent staff from bringing personal items into food handling or storage areas
- Y N N/A Don't know - Provide for regular inspection of contents of staff lockers, bags, packages, and vehicles when on company property

Training in Food Security Procedures



- Y N N/A Don't know - Incorporate food security awareness, including how to prevent, detect, and respond to tampering or other malicious or terrorist threats, into training programs for all staff
 - Y N N/A Don't know -
 - Y N N/A Don't know -
- Encourage staff participation in security procedures

Unusual Behavior

- Y N N/A Don't know - Watch for unusual or suspicious behavior by staff

Staff Health

- Y N N/A Don't know - Be alert for atypical staff health conditions or absences (that staff may voluntarily report) that could be an early indicator of tampering or other malicious actions, and reporting such conditions to local health authorities



Human Element -- Public

Visitors (Non-Employees)

- Y N N/A Don't know - • Restrict entry to the establishment
- Y N N/A Don't know - • Ensure that there is a valid reason for the visit before providing access to the site - beware of unsolicited visitors
- Y N N/A Don't know - • Verify the identity of unknown visitors
- Y N N/A Don't know - • Restrict access to food handling and storage areas
- Y N N/A Don't know - • Restrict access to employee "mudroom" room

Site

Physical Security

- Y N N/A Don't know - • Protect perimeter access with fencing or other deterrent
- Y N N/A Don't know - • Secure all doors, vent openings, ventilation systems, utility rooms, storage rooms
- Y N N/A Don't know - Use metal or metal-clad exterior doors when the site is not in operation, except where visibility from public thoroughfares is an intended deterrent
- Y N N/A Don't know - • Minimize the number of entrances to restricted areas
- Y N N/A Don't know - • Secure bulk unloading equipment when not in use and inspect the equipment before use
- Y N N/A Don't know - • Account for all keys to establishment
- Y N N/A Don't know - • Monitor the security of the premises using appropriate methods
- Y N N/A Don't know - Minimize, to the extent practical, places that can be used to temporarily hide intentional contaminants
- Y N N/A Don't know - Provide adequate interior and exterior lighting, include emergency lighting, where appropriate, to facilitate detection of suspicious or unusual activities

Storage and use of poisonous and toxic chemicals (for example, cleaning and sanitizing agents, pesticides)



- Y N N/A Don't know - Limit poisonous and toxic chemicals in the establishment to those that are required for the maintenance of the site
- Y N N/A Don't know - Store away from food and limit access to poisonous and toxic chemicals
- Y N N/A Don't know - Limit access to and secure storage areas for poisonous and toxic chemicals that are not being held for sale
- Y N N/A Don't know -
 - Y N N/A Don't know - Ensure poisonous and toxic chemicals are properly labeled
- Know what poisonous and toxic chemicals should be on the premises and keeping track of them
- Y N N/A Don't know - Investigate stock irregularities outside a normal range of variation and alert appropriate law enforcement and public health authorities about unresolved problems



Operations

Incoming materials and contract operations:

- Y N N/A Don't know - Take reasonable steps to ensure that suppliers and transporters practice appropriate food security measures
- Y N N/A Don't know - Authenticate labeling and packaging configuration and expiration dates (where applicable) for incoming materials in advance of receipt of shipment, especially for new products
- Y N N/A Don't know - Request that the transporter have the capability to verify the live location of the load at any time, when practical
- Y N N/A Don't know - Establish delivery schedules, not accepting unexplained, unscheduled deliveries or drivers, and investigate delayed or missed shipments
- Y N N/A Don't know - Supervise off-loading of incoming materials, including off hour deliveries
- Y N N/A Don't know - Reconcile the product and amount received with the product and amount ordered and the product and amount listed on the invoice and shipping documents, taking into account any sampling performed prior to receipt
 - Y N N/A Don't know - • Investigate shipping documents with suspicious
 - Y N N/A Don't know - alterations
- Inspect incoming materials, including, labels, product and product returns
 - Y N N/A Don't know - • Reject suspect food
 - Y N N/A Don't know - • Alert appropriate law enforcement and public health authorities about evidence of tampering, "counterfeiting" or other malicious, criminal, or terrorist action

Storage

- Y N N/A Don't know - Have a system for receiving, storing, and handling distressed, damaged, returned, and rework products that minimizes their potential for being compromised or to compromise the security of other products



- Y N N/A Don't know - Keep track of incoming materials and materials in use, including, packaging, labels, salvage and rework products and returns
- Y N N/A Don't know - Investigate missing or extra stock or other irregularities outside a normal range of variability and report unresolved problems to appropriate law enforcement and public health authorities, when appropriate
- Y N N/A Don't know - Minimize reuse of containers, shipping packages, cartons, etc., where practical

Finished products

- Y N N/A Don't know - Perform random inspection of storage sites and vehicles
- Y N N/A Don't know - Request locked and/or sealed vehicles/containers/railcars and provide the seal number to the consignee
- Y N N/A Don't know - Request that the transporter have the capability to verify the live location of the load at any time
- Y N N/A Don't know - Establish scheduled pickups, and not accepting unexplained, unscheduled pickups
- Y N N/A Don't know - Investigate missing or extra stock or other irregularities outside a normal range of variation and alerting appropriate law enforcement and public health authorities about unresolved problems, when appropriate
- Y N N/A Don't know - Advise sales staff to be on the lookout for counterfeit products and to alert management if any problems are detected

Access to computer systems

- Y N N/A Don't know - Restrict computer access to those with appropriate clearance
- Y N N/A Don't know - Eliminate computer access when a staff member is no longer associated with the establishment
- Y N N/A Don't know - Establish a system of traceability of computer transactions
- Y N N/A Don't know - Review the adequacy of virus protection systems and procedures for backing up critical computer based data systems



Y N N/A Don't know - Validate the computer security system

If an employee suspects that any the FDA-regulated products have been subject to tampering, "counterfeiting," or other malicious, criminal, or terrorist action, FDA recommends notifying the **24hour emergency number at 301-443-1240** or call their local FDA District Office. FDA recommends that the operator also notify local law enforcement and public health agencies.

FDA Local Office: Springdale, AR (District 35)

Country Club Center, Bldg. B, Suite 201 · 4700 South Thompson, Springdale, AR 72764
Phone: (479) 751-8412 · **Fax:** (479) 751-9049 · **24-Hour Emergency:** (479) 751-8412
Admin. Functions: Ms. Liz Meersman, (479) 770-0924

Mr. Robert Bane	(479) 770-0982	Robert.Bane@usda.gov
Mr. Jeffery Barham	(479) 770-0912	Jeffery.Barham@usda.gov
Dr. Don Dowdle	(479) 770-0910	Don.Dowdle@usda.gov
Dr. Evan Sumner	(479) 770-0965	Evan.Sumner@usda.gov
Liz Simmons	(479) 770-0916	Springdale.GrantCurator@usda.gov

For import field issues, please contact OFO District Offices:

FSIS Office of Field Operations: Resource Management and Planning Staff Phone:
(202) 418-8907

Access, Traffic Process and Security:

All after hours entries are protected via an automatic alarm system, monitored by the company's contracted Security Company. All refrigerators are within monitored motion-sensor lighting and video recording and monitored for temperature control.

Access for all employees is through the front door; except warehouse employees, who after entry door at the front of the building, enter a second door labeled "Employees Only" to access the warehouse.

On entry warehouse employees first go to the "mudroom area" to store their personal items and/or change into warehouse clothing and wash up before entering the warehouse area. See employee movement on attached flow chart.



All visitors gain access by the front entry door and sign the visitor's log. Visitors other than contractors may access the office without going into the warehouse. Should warehouse access be required the visitors must follow standard personnel hygiene practices.

Delivery and shipping is via the dock(s) and others, such as mail and office supplies through reception at the front door. Truck drivers are not allowed unsupervised entry to the warehouse and must sign in at entry. Products are stored in separate areas and moved through the building.

Approved By

Date





2.8 Allergen Management (M)

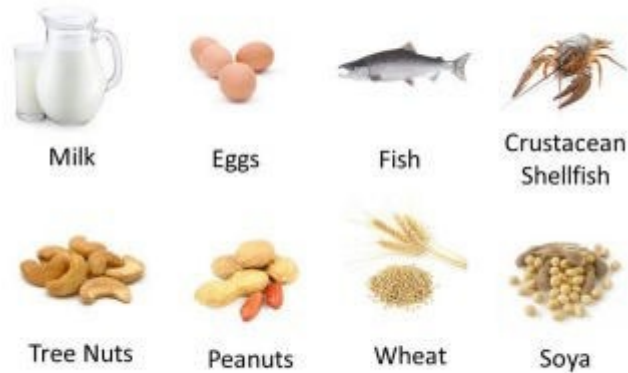
2.8.1 Allergen Management (M)

Background Scope:

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management controls shall include the identification and handling of compromised product to prevent inadvertent cross contact.

USDA recognizes eight major food allergens: eggs, milk, fish, crustacean shellfish, tree nuts (Brazil nut, chestnut, hazelnut, pine nut, and walnut), peanuts, wheat, and soybean.

The Big-8



All fresh products containing, grown, harvested, or shipped within contact with any of the above identified allergens, is labeled and isolated from other fresh produce.

There are some pre-packaged goods that include known allergens; however, it is the main ingredient of the good and clearly written all over the package.

Further, all suppliers agree to disclose any and all allergen contact with the preferred products of the site.



Instructions:

RECEIVING AND STORING

1. When receiving known raw allergens, separate from remaining shipment and store in dedicated slot.
2. If not possible, properly tag the product **“Allergen”** and store as soon as possible.

PICKING AND LOADING

1. When picking seal known raw allergens in a separate box and label **“Allergen”**.
2. Make certain the invoice indicates that known raw allergens are being shipped.

CROSS CONTAMINATION

1. If any fresh products come into contact with known raw allergens, immediately isolate both the allergen and the product impacted.
2. Determine if any contaminated product was shipped and track and notify
3. If possible, determine if the contamination is isolated and rework can preserve some portion, or if the entire case or pallet must be destroyed.
4. In rare cases, the product can be transferred to a farm depending on type of contamination.

2.8 APPENDIX: RELATED FORMS & CHARTS

SE Ref.	Title/Description	Binder
2.8.1	Allergen Signage	Procedures
2.8.1	Product Allergen List	Procedures
2.8.1	Cross Contamination Process Flow Chart	Procedures

Allergen Reference: <https://farrp.unl.edu/informalltreenuts>



2.9 Training See the Practitioner for your individual plan.