NSF International

Audit Criteria for Food Contact Packaging Materials, Food-Related Items, and Personal Care (Contact) Products

Company Information	Audit Information
Facility: [redacted] [redacted] [redacted] **Title:** [redacted] [redacted] **Fax:** [redacted] [redacted]	**Audit# - Visit#:** 934594 - 682141 **Audit Type:** PKG - Audit Criteria for Food Contact Packaging Materials, Food-Related Items, and Personal Care (Contact) Products **Template Version:** 2 **Audit Category:** REGULAR **Auditor:** Rong Liang **Audit Start Time:** 28-AUG-2014 09:00:00 AM **Audit End Time:** 28-AUG-2014 04:55:00 PM **Prior Audit Date:** 10-JUL-12 **Prior Audit Score:** 90.55%

Audit Result: Needs Improvement

Facility and Operating Profile

No	Question/Notes
1	**Facility and Operations Description:** Auditor's Notes: [redacted] occupancy area is approximate 2700 square meters in this location. The production building is just one floor including warehouse area, processing area and packaging room. The manufacturing facility has approximate 50 employees, injection position working with 3 shifts and packaging position working with one shift, 5 days a week.
2	**Was the audit Announced or Unannounced?** Announced
3	**Products made at this facility:** Disposable cutlery products made of PLA or PSM material
4	**The following departments and individuals participated in the audit process:** [redacted]

Section Notes :

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Score Summary By Section	
Section Name	**Section Score**
Section A - Administration and Regulatory Compliance	87.00%
Section B - HACCP Management	87.00%
Section C - Facilities and Equipment	88.00%
Section D - Sanitation, Housekeeping and Hygiene	85.00%
Section E - Rodent and Pest Control Management	85.00%
Section F - Approved Suppliers, Receiving and Inventory Control	91.00%
Section G - Process and Product Evaluation	95.00%
Section H - Packaging and Labeling	95.00%
Section I - Storage and Shipping	89.00%
Section J - Training Requirements	89.00%
Section K - Laboratory Support	95.00%
Section L - Product Defense	95.00%
Food Safety, Quality and Food Defense Audit Average Score:	**90.08%**

Category Scoring Guide

95% - 100% = Meets or Exceeds Audit Expectations
85% - 94.99% = Needs Improvement
75% - 84.99% = Needs Significant Improvement
<75% = Critical

Automatic Audit Failure (Denoted as a "Critical" item in the audit report)

- Product Contamination and/or adulteration
- Significant deviation from identified CCP in the HACCP Plan
- Mislabeled or misbranded product
- Record falsification
- Significant deviation from specification
- Facility is not operating in compliance with stated regulatory requirements

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Overview	
No	**Question/Notes**
	Notes from the auditor: See Notes Product safety, quality and product defense management system was established in 2008. Product identification, traceability and recall control procedure #LH-QP-2008-A/0 was available. Receipt date was set to the traceable lot number of raw material and was identified for each lot in warehouse. And the lot number was documented in the blending records. Internal audit and management review were conducted annually and documentations were available for review. The customer complaint handling procedure was established. And the company stated that there was no customer complaint happed in these years. Hygiene management program #LH-WI-05-2008 defined that facilities including wall, floor and windows should be cleaned weekly. And the completion monitoring records were available. Pest control procedure was available. The mechanical traps and insect light traps were equipped at interior of facility. The procedure defined that pest control devices were inspected daily. The site maps of pest control device were available and dated and signed. The inspection records for pest control device were available. Raw material inspection records were available. It included the sanitary condition of inbound vehicles, packaging intactness etc. Employees wore the clean outer garments and caps in production area. Packaging desks were made of stainless steel and kept clean in this audit. Products were stored into plastic containers and transferred into packaging room. Production inspection criteria were available and focused on the appearance, free of oil contamination, black point, splash and irregular shape. Inspection reports for finished products were documented before release. The annual training plan was available. The training topics included HACCP, operational prerequisite program, personal hygiene etc. The training was taken place monthly. The training was documented, including training date, training topic summary trainees' signature. The training records showed the training comprehension was verified by oral testing. Product defense program was available. The management team was assembled. The program included employee background screen, security inspect for vehicle enter or exit, computer security management, employee identification, non-employee log in and the chemical storage. Video monitoring system was equipped in production area and warehouse area.
Section Notes :	

Non-Compliance Summary		
No	**Question/Notes**	**Answer**
Section A /2	**Policies and Procedures Manual** **The product safety and quality management system with its policies and procedure established in 2008. Policies and procedures were not reviewed for effectiveness i six years.**	Needs Improvement*

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Section A /4	**Product Identification, Traceability and Recall Plans and Procedures** **Product identification, traceability and recall control procedure #LH-QP-2008-A/0 wa available.** **However the list of recall team members including names of members, their responsibilities and 24/7 contact information was not available in this audit. Traceability exercises were conducted twice every year. Traceability exercise cond in Apr. was completed within 2 hours and finished product recovery achieved 100%.**	Needs Improvement*
Section A /9	**Crisis and Natural Disaster Management** **The crisis and natural management program was established and the program descr the handling procedure for crisis situations such as fire and natural disaster such as flood. The management team was assembled.** **However the status of program was not evaluated annually.**	Needs Improvement*
Section B /4	**Critical Limits (HACCP Principle 3)** **Raw material incoming inspection was identified as CCP. The CCP monitoring proce showed the potential contaminants such as heavy metal were identified as monitori object at raw material incoming inspection.** **However the contaminants limits, which should be set as critical limits, were not defined.**	Needs Improvement*
Section B /5	**CCP Monitoring (HACCP Principle 4)** **The hazard analysis document was available. The incoming inspection of raw materi injection were identified two CCPs. However the CCP monitoring procedure for injec was not available in this audit.**	Needs Improvement*
Section C /3	**Plant Condition (Walls, Ceilings, Floors, etc.)** **The flaking paint was on the wall was in the substandard product crushing room.**	Needs Improvement*
Section C /5	**Handwashing Facilities** **There were four hand washing station at entrance to production workshop. Two stat were identified to be repaired during on-site audit. Another station did not deliver th adequate water flow for hand washing. There was just one fully functional hand was station.**	Needs Improvement*
Section D /2	**Standard Sanitation Operating Procedures and Monitoring** **SSOP for product contact surface was available.** **However the procedure does not define the frequency of cleaning for product-contac surfaces. (In reality, the cleaning records showed the product contact surfaces were cleaned twice daily.)** **The cleaning process for the drying machine was documented only up to May in this The cleaning records in Jun. and Jul. were not available.**	Needs Improvement*

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Section D /5	**Verification of Cleaning Effectiveness** **Sanitation effectiveness was monitored visually prior to production start up in this p** **Objective measurements such as bioluminescence or microbiological surveys to demonstrate the effectiveness of the sanitation procedures are not conducted.**	Needs Improvement*
Section D /6	**Operational Housekeeping and Monitoring** **Dust with cobwebs was accumulated on the windowsill in raw material warehouse i audit.**	Needs Improvement*
Section E /2	**Outside Premises Management (Grounds, Waste Disposal Areas)** **Weeds were observed along outside premises.**	Needs Improvement*
Section E /3	**Inside Premises Management** **Mechanical traps were just equipped at one side of exterior opening doorway. Both is required.**	Needs Improvement*
Section E /4	**Pest Tight Doors and Entrance Closures** **The door to exterior was not closed fully in warehouse. There was gap present betv the doorjamb and floor.**	Needs Improvement*
Section F /1	**Supplier Approval Policies and Procedures** **The list of approval suppliers was available. The test reports for PLA material and PS material were available to demonstrate for food conduct product use.** **However, these reports were are not current, being issued in 2011 and 2012. The continuous test report or guarantee letter was not available annually.**	Needs Improvement*
Section I /1	**Warehouse and Finished Product Management** **Finished products were stored against the wall in warehouse. There was no adequat space for inspection and cleaning along the premise in warehouse.**	Needs Improvement*
Section I /2	**Retained and Returned Products** **There was a designated zone for storing the retained products inside the production** **However, the inventory of retained products was not maintained.**	Needs Improvement*
Section J /1	**New Hire Training (GMP, Food Defense, HACCP)** **Two new employees joined in this year and they were not provided the orientation training.**	Needs Improvement*
Section J /7	**Training Program Review** **Training program was not reviewed in this plant.**	Needs Improvement*

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Section A. Administration and Regulatory Compliance		
No	**Question/Notes**	**Answer**
1	**Organization and Responsibilities**	Acceptable
2	**Policies and Procedures Manual** **The product safety and quality management system with its policies and procedures was established in 2008. Policies and procedures were not reviewed for effectiveness in past six years.**	Needs Improvement*
3	**Management Awareness and Commitment**	Acceptable
4	**Product Identification, Traceability and Recall Plans and Procedures** **Product identification, traceability and recall control procedure #LH-QP-2008-A/0 was available. However the list of recall team members including names of members, their responsibilities and 24/7 contact information was not available in this audit. Traceability exercises were conducted twice every year. Traceability exercise conducted in Apr. was completed within 2 hours and finished product recovery achieved 100%.**	Needs Improvement*
5	**Regulatory Compliance** **A file of regulatory visits and reports is maintained and includes third party audits and audits conducted by customers. Corrective actions were documented.**	Acceptable
6	**Document and Records Management** **A document control policy is in place that identifies current revision status, specifies time limit for holding of files and indicates proper disposition of outdated documents and records. Records are indexed and easily retrievable.**	Acceptable
7	**Change Management** **A policy describing how the facility manages and communicates changes in specifications, policies and procedures in order to maintain continuity and the control of systems is documented.**	Acceptable
8	**Documentation to Track Effectiveness of Policies**	Acceptable
9	**Crisis and Natural Disaster Management** **The crisis and natural management program was established and the program described the handling procedure for crisis situations such as fire and natural disaster such as flood. The management team was assembled. However the status of program was not evaluated annually.**	Needs Improvement*
10	**Customer/Consumer Complaints (Policies, Follow Up and Response)** **A written customer complaint program that addresses responsibilities, response time and corrective actions based on the investigation of a complaint is in effect.**	Acceptable
Section Notes :		

Section B. HACCP Management		
No	**Question/Notes**	**Answer**
1	**Preliminary HACCP Tasks** **A HACCP team is assembled and team member responsibilities are clearly identified. The team has constructed flow diagrams outlining each step in the process and has performed an on site review to verify its accuracy.**	Acceptable
2	**Hazard Analysis (HACCP Principle 1)** **The HACCP team has prepared a list of all chemical, physical and biological hazards that may occur and has conducted a hazard analysis to identify the hazards that are critical and controllable.**	Acceptable
3	**Critical Control Points (HACCP Principle 2)** **Documentation for determining a step or process as a CCP or not, is clearly and thoroughly explained and is scientific based. Meetings are conducted on a regular basis by the HACCP team to review any changes in the process that might affect the CCP determination.**	Acceptable
4	**Critical Limits (HACCP Principle 3)** **Raw material incoming inspection was identified as CCP. The CCP monitoring procedure showed the potential contaminants such as heavy metal were identified as monitoring object at raw material incoming inspection. However the contaminants limits, which should be set as critical limits, were not defined.**	Needs Improvement*
5	**CCP Monitoring (HACCP Principle 4)** **The hazard analysis document was available. The incoming inspection of raw material and injection were identified two CCPs. However the CCP monitoring procedure for injection was not available in this audit.**	Needs Improvement*

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Section B. HACCP Management		
No	**Question/Notes**	**Answer**
6	**Corrective Actions (HACCP Principle 5)**	Acceptable
7	**Verification and Validation (HACCP Principle 6)**	Acceptable
8	**Documentation and Record Keeping (HACCP Principle 7)**	Acceptable
Section Notes :		

Section C. Facilities and Equipment		
No	**Question/Notes**	**Answer**
1	**Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management** **All water supply is potable, meets local requirements and is tested at least annually. Water lines and hose drops are fitted with backflow prevention devices that are tested by a trained inspector at least annually. There are no dead ends on potable water lines and no hose nozzles were observed submerged in water reservoirs or left laying on the floor. An adequate supply of hot and cold water is readily available for production, sanitation and handwashing. There is a documented procedure for handling backed up drains in production and no sewage disposal problems were observed.**	Acceptable
2	**Plant Construction and Design** **The facility is constructed in a manner conducive to handling product in a sanitary manner. No observations of overhead contamination or cross contamination were observed. Materials are easily cleanable, floors are well drained and drains have traps and covers. No objectionable odors, fumes or vapors were present. Interior air supplies are screened and filtered and no dust or standing water was observed around the exterior. An essential glass and brittle plastic program is monitored monthly.**	Acceptable
3	**Plant Condition (Walls, Ceilings, Floors, etc.)** **The flaking paint was on the wall was in the substandard product crushing room.**	Needs Improvement*
4	**Employee Facilities** **The cafeteria, locker room and toilet facilities are adequately sized, physically separated from food production areas and are maintained in a sanitary condition. Toilet facilities are mechanically ventilated to the outside and doors are self-closing and do not open directly into the production areas. Signs are clearly posted in locker rooms, toilet facilities and at entrances to work areas reminding employees to wash and sanitize their hands before starting work and when leaving toilet facilities.**	Acceptable
5	**Handwashing Facilities** **There were four hand washing station at entrance to production workshop. Two stations were identified to be repaired during on-site audit. Another station did not deliver the adequate water flow for hand washing. There was just one fully functional hand washing station.**	Needs Improvement*
6	**Equipment Layout, Design and Conditions** **Equipment is designed, installed and maintained in a manner that provides a safe, wholesome and quality product with easy access for cleaning and sanitizing. Where equipment may make direct product contact, it is constructed with materials that are smooth, impervious, non-toxic, non-absorbent and corrosion resistant with appropriate covers and no metal-to-metal contact between moving parts.**	Acceptable
7	**Plant Lighting and Protection** **Adequate illumination is provided and lighting is protected from breakage and possible contamination. Light fixtures are maintained clean, free of cracks, dust or other materials that could cause contamination.**	Acceptable
8	**Maintenance Standard (Support of GMPs, Housekeeping, Lubricants)** **There is a documented preventative maintenance program that covers the equipment and facilities. Permanent repairs are made promptly. Food-grade and non-food grade lubricants are not stored together.**	Acceptable
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Section D. Sanitation, Housekeeping and Hygiene		
No	**Question/Notes**	**Answer**
1	**Master Sanitation Schedule and Monitoring**	Acceptable
2	**Standard Sanitation Operating Procedures and Monitoring** **SSOP for product contact surface was available. However the procedure does not define the frequency of cleaning for product-contact surfaces. (In reality, the cleaning records showed the product contact surfaces were cleaned twice daily.) The cleaning process for the drying machine was documented only up to May in this year. The cleaning records in Jun. and Jul. were not available.**	Needs Improvement*
3	**Cleaning Chemical and Sanitizer Control** **There are procedures that specify the proper dilution of chemicals and/or sanitizers and all containers of cleaning chemicals and sanitizers are properly labeled. Chemical containers are used for their intended purpose only. Chemicals are securely stored during periods of non-use.**	Acceptable
4	**Pre Operational Monitoring and Corrective Action** **A routine documented inspection program is in place to assess sanitation practices and conditions prior to daily operation. Deficiencies are noted and corrective actions taken are documented.**	Acceptable
5	**Verification of Cleaning Effectiveness** **Sanitation effectiveness was monitored visually prior to production start up in this plant. Objective measurements such as bioluminescence or microbiological surveys to demonstrate the effectiveness of the sanitation procedures are not conducted.**	Needs Improvement*
6	**Operational Housekeeping and Monitoring** **Dust with cobwebs was accumulated on the windowsill in raw material warehouse in this audit.**	Needs Improvement*
7	**Personal Hygiene and Good Manufacturing Practices** **Employee training is provided that covers plant specific Good Manufacturing Practices, Personal Hygiene, Plant Sanitation, HACCP and Product Tampering Awareness. All sanitation employees receive training in basic food handling. Continuing refresher training is provided at least quarterly and records are kept of individual training programs and topics covered for each employee. Training is presented in an appropriate language to be clearly understood by all employees. Detailed dress codes and personal hygiene requirements are provided.**	Acceptable
8	**Internal Audits and Corrective Actions** **Internal GMP self-inspections are conducted to verify compliance to policies and to evaluate the effectiveness of the policies. Follow-up audit activities are conducted to record the effectiveness of corrective actions for deficiencies and repeat items.**	Acceptable
Section Notes :		

Section E. Rodent and Pest Control Management		
No	**Question/Notes**	**Answer**
1	**Documented and Specific Pest Control Program** **There is a current pest management policy and program that outlines the responsibilities of the Pest Control Operator (PCO), the proper use of internal trapping devices, outside bait stations and the documentation of service and activity reports. Site maps for all traps and bait stations were current, Material Safety Data Sheet (MSDS) and the PCO applicator's license and letter of insurance were current and on file.**	Acceptable
2	**Outside Premises Management (Grounds, Waste Disposal Areas)** **Weeds were observed along outside premises.**	Needs Improvement*
3	**Inside Premises Management** **Mechanical traps were just equipped at one side of exterior opening doorway. Both sides is required.**	Needs Improvement*
4	**Pest Tight Doors and Entrance Closures** **The door to exterior was not closed fully in warehouse. There was gap present between the doorjamb and floor.**	Needs Improvement*
5	**Secure Storage and Documentation of Pest Related Chemicals**	Acceptable
6	**Detailed Activity Reports with Corrective Actions** **Activity reports were available, indicating specific sites of activity, type of activity, recommended corrective action, specific chemicals used, quantities used, locations where used, the date used and for what purpose. Activity reports were signed by the PCO and by a designated plant representative. Deficiencies are addressed with corrective action documentation.**	Acceptable
Section Notes :		

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Section F. Approved Suppliers, Receiving and Inventory Control		
No	**Question/Notes**	**Answer**
1	**Supplier Approval Policies and Procedures** **The list of approval suppliers was available. The test reports for PLA material and PSM material were available to demonstrate for food conduct product use. However, these reports were are not current, being issued in 2011 and 2012. The continuous test report or guarantee letter was not available annually.**	Needs Improvement*
2	**Incoming Vehicle Inspection and Documentation** **A written inspection program describes acceptable and/or unacceptable conditions for all inbound carriers. All inbound carriers are inspected for food safety, quality and security related concerns at the time of receiving.**	Acceptable
3	**Release Criteria for Ingredients** **All ingredients are maintained in a secure fashion and released for use against a defined approval program. An inventory management system is in place to assure proper rotation.**	Acceptable
4	**Storage and Handling Policies and Practices** **Procedures for the storage and handling practices of ingredients and supplies have been established to assure they do not become a source of contamination. Receiving areas and storage locations are maintained in a clean and sanitary manner and ingredients and supplies are held under conditions necessary to maintain product integrity.**	Acceptable
5	**Bulk Receiving Systems Sanitation and Monitoring** **There was no bulk material used in this plant.**	N/A
6	**Restricted and/or Sensitive Ingredient Control, Including Chemical Compounds** **Restricted ingredients, sensitive ingredients, allergenic materials and potentially toxic chemicals are stored separately and maintained under strict control. Toxic chemicals and flammable solvents are stored in secured and restricted areas. Usage records and inventories are maintained for toxic materials and Material Data Safety Sheet (MSDS) are readily available for all chemical compounds in the facility.**	Acceptable
Section Notes :		

Section G. Process and Product Evaluation		
No	**Question/Notes**	**Answer**
1	**Process Control and Documentation Procedures** **Process control procedures are established, monitored and documented to assure product is manufactured to meet all food safety requirements. In-process ingredients and products are adequately protected and properly labeled with date and lot number.**	Acceptable
2	**Specification and Formulation Control and Accuracy** **Records are available that demonstrate compliance to product formulations and finished product specifications. Test protocols and frequencies are followed as identified in the specification and production records are maintained for twelve months beyond product shelf life.**	Acceptable
3	**Routine Calibration of Operational Equipment and Measuring Devices (such as thermometers, scales, flow meters, counters, metal detectors, etc.)** **Key process control devices are calibrated by an outside contractor at least annually and monitored internally on a regular basis to assure accuracy on a day-to-day basis. Thermometers used for product evaluations are calibrated on a daily basis, documented and traceable. All weighing scales are checked and documented daily to verify accuracy. Corrective actions when measuring devices are found to be out of calibration are documented.**	Acceptable
4	**Foreign Material Control** **Finished product is passed through a calibrated metal detector. There is a written procedure for the maintenance, set-up and verification testing of metal detectors and documentation of calibration and set-up is part of the daily production records. Detector rejects and the cause for rejection is recorded on a calibration/test log.**	Acceptable
5	**Application of Statistical Control** **Statistical control is used to determine the capability of the process equipment and the setting of critical limits for critical control points.**	Acceptable
6	**Allergen and Sensitive Ingredient Controls** **Production of products containing allergens is conducted under a detailed procedure to prevent the contamination of other products. Ingredients containing allergens are clearly identified as such and properly controlled in the production area. Labeling of products containing the presence of the allergens is conducted as required by regulations.**	Acceptable

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Section G. Process and Product Evaluation		
No	**Question/Notes**	**Answer**
7	**Specification Compliance Documentation** **Records are maintained to document that product is manufactured according to specification. Finished products are inspected and tested. Product is not shipped until all parameters meet specification and approved by management.**	Acceptable
8	**Rework and Carryover Products** **There is a documented procedure for managing rework and carry over products. Rework is traceable to its original production and to finished product. Production dates and original lot numbers are carried forward in production documents. Rework and carry-over is kept to a minimum and used promptly at the first opportunity. There is a routine and documented "clean break" in the rework/carryover cycle.**	Acceptable
9	**Analytical Records Management** **Established systems are utilized to properly store and retrieve analytical information, documents, reports, records, etc.**	Acceptable
Section Notes :		

Section H. Packaging and Labeling		
No	**Question/Notes**	**Answer**
1	**Label Accuracy and Regulatory Compliance** **Procedures and policies are in place to assure proper labeling of products and that labels meet regulatory requirements.**	Acceptable
2	**Documented Net Weight or Count Compliance Policy and Performance** **A documented policy for net quantity compliance requires the calibration of quantity measuring devices. Calibration checks are conducted at the beginning and end of production and are documented on production records.**	Acceptable
3	**Clear Manufacturing Codes on Individual and Cased Product** **All product coding is of such size, color and contrast to afford easy legibility at a reasonable distance. Each individual sell unit has a production or lot code. Packages within the sell unit have a lot code.**	Acceptable
4	**Package Integrity and Function** **All packaging is designed and assembled to provide protection for the product from environmental and shipping conditions. Verification of proper sealing and closure of the packaging is conducted.**	Acceptable
5	**Label Security and Obsolete Label Controls** **There is a written plan describing the security measures for labeling materials to prevent unauthorized or accidental use and to prevent the use of obsolete labels.**	Acceptable
Section Notes :		

Section I. Storage and Shipping		
No	**Question/Notes**	**Answer**
1	**Warehouse and Finished Product Management** **Finished products were stored against the wall in warehouse. There was no adequate space for inspection and cleaning along the premise in warehouse.**	Needs Improvement*
2	**Retained and Returned Products** **There was a designated zone for storing the retained products inside the production area. However, the inventory of retained products was not maintained.**	Needs Improvement*
3	**Storage Facility and Dock Maintenance** **Warehouse storage areas are clean and orderly and have adequate space around the periphery for access, inspection and cleaning. Items are stored off the floor, floors and walls are in good condition and emergency doors are tight fitting. Shipping docks, dock plates and levelers are clean and kept orderly.**	Acceptable
4	**Transport Condition** **Written procedures for acceptable carrier conditions are available to shipping personnel. Outbound trailers are inspected and results are documented. No product is loaded into unacceptable carriers. When non-dedicated carriers are used, trailer logs are assessed to determine if unacceptable materials had been present.**	Acceptable

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Section I. Storage and Shipping		
No	**Question/Notes**	**Answer**
5	**Release Authorization to Ship Product** **Release authorization is required before any product is shipped.**	Acceptable
Section Notes :		

Section J. Training Requirements		
No	**Question/Notes**	**Answer**
1	**New Hire Training (GMP, Food Defense, HACCP)** **Two new employees joined in this year and they were not provided the orientation training.**	Needs Improvement*
2	**Training Language** **Training is provided in the language and presentation format that can be easily and clearly understood by the trainee.**	Acceptable
3	**Prerequisite Program Training** **The documented training program includes pre-requisite training for basic food handling sanitation and for specific critical jobs and monitoring requirements for HACCP CCP's. There is documented training for all sanitation employees.**	Acceptable
4	**Refresher Training** **The documented training program requires that employee training, in the specified topics, be conducted at least annually. Intermediate training, with documented topics and attendees, regarding the defined training topics is conducted at least quarterly.**	Acceptable
5	**Proof of Knowledge** **The employee training program requires that training comprehension be verified through employee testing or documented management observation.**	Acceptable
6	**Training Records** **All employee training records are being maintained.**	Acceptable
7	**Training Program Review** **Training program was not reviewed in this plant.**	Needs Improvement*
Section Notes :		

Section K. Laboratory Support		
No	**Question/Notes**	**Answer**
1	**Laboratory Facility and Staffing** **Laboratories are adequately equipped and staffed to provide the essential technical support. Lab staff qualifications are documented, toxic supplies are securely stored and properly labeled and the laboratory is clean, orderly and well lit.**	Acceptable
2	**Laboratory Procedures and Documentation** **Laboratory procedures are documented, authorized and dated. Testing procedures are based on recognized and approved procedures and documentation of all testing is available.**	Acceptable
3	**Laboratory Equipment Calibration** **Records of laboratory balances and test equipment calibrated by a certifying company are documented. Calibrations checks conducted internally are documented with specific instrument identification, date of calibration and the individual performing the calibration check.**	Acceptable
4	**Analytical Accuracy Verification** **Detailed test procedures, work instructions, training records and record keeping are established to verify that monitoring and test results meet finished product specifications. Tests performed are documented and meet accepted standards of a recognized authority. Documented evidence is available that demonstrates laboratory test results are accurate and reliable.**	Acceptable
5	**Third Party Laboratories**	Acceptable
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Section L. Product Defense		
No	**Question/Notes**	**Answer**
1	**Management** **A Food Defense team has been established and a risk assessment has been conducted to evaluate intentional, internal and external vulnerabilities and risks that exist from ingredient sourcing, storage, processing, shipping of finished goods and personnel. A documented Food Defense program has been identified, organized, communicated and implemented and is fully understood by plant employees, suppliers and customers. Product and facility security roles and responsibilities are documented and defined and appropriate management controls have been initiated. The facility has a registration number from the applicable regulatory agency and unusual occurrences are documented and assessed by management.**	Acceptable
2	**Human Element** **All individuals entering the facility must show proof of identification. Temporary employees are fully supervised at all times. Contractors and visitors are required to show identification and sign in and out. Visitors are accompanied while in the facility. A current roster of employees and work assignments is maintained and employees are prohibited from bringing personal items such as purses, cases, containers, lunch boxes, etc. into processing areas. A screening program is in place for all employees and a program to train Food Defense rules at the facility has been implemented. Training is documented for each individual at the facility.**	Acceptable
3	**Facility** **A schematic of the facility and outside grounds is available that identifies all entrances into the building, accesses to the roof and sensitive areas. Access to sensitive areas and utilities is restricted. When not in use, non-traffic doors, dock doors and utility access is secured. Emergency doors are alarmed. A process for issuing, tracking and retrieving keys, identification badges and passes for the buildings and for secure areas is documented.**	Acceptable
4	**Operations** **The facility has been evaluated for vulnerability to sabotage and documented policies and procedures have been developed to address areas of concern. Non-employee drivers and delivery personnel have designated waiting areas. Trucks and/or trailers are inspected before unloading. Damaged product, where the cause of damage is unknown, is not used. Transport vehicles are kept secure when not in the process of loading or unloading. Vehicles are secured after loading is completed and seal numbers are recorded.**	Acceptable
Section Notes :		

* Represents Non-Conformances.

If you have any questions about this report, please contact your NSF Representative at 1-800-NSF-MARK.

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