FOOD SECURITY GUIDELINES

CRITERIA DEFINITIONS

Ideal All aspects of the element have been met or exceeded. No significant improvement required at this time. Focus should be on maintaining element at current level.

Fair Element meets basic expectations. Continued efforts could be made to improve the element and address all criteria listed. Resources or program modifications may be needed to reach the Ideal level.

Weakness Element expectations are not being met. The element is either missing or not utilized appropriately. Significant changes must be made to reach the Fair or Ideal level. Sufficient resources and/or program modifications must be applied to correct deficiencies. Program should not be considered acceptable as currently defined. Deficiencies could lead to food security issues.

THE FOOD SECURITY GUIDELINES have incorporated industry recommendations, FDA Guidance documents, and security guidelines. This program will assist food manufacturers in evaluating their facilities in regard to food security.

THE FOOD SECURITY EVALUATION is intended to be a tool to evaluate the food security of a facility. The guidelines were developed to cover a wide spectrum of the food industry. The Food Security Evaluation is to be rated based on the criteria set forth in the Food Security Guidelines. Some of the items may not pertain to each and every facility utilizing the guidelines. Not applicable (N/A) should be marked in the "Rating" section of the specific item to which that item does not apply to the facility. A brief statement should be made in the "Comments" section as to why the item does not apply to the facility. For all items that pertain to the facility, a rating of Ideal, Fair, or Weakness will be assigned. The auditor will determine the rating of each item. The auditor will utilize the Food Security Guidelines to assess the facility's compliance with the specific item.

The criteria spelled forth in the Food Security Guidelines are designed to assist the facility in achieving a sound food security program. Some of the criteria may be difficult for each facility to meet. The Food Security Evaluation is designed to assist the facilities in assessing potential weaknesses in their food security program. After the evaluation is complete, it should be the facility's responsibility to review the items rated as Fair or Weakness. The Fair and Weakness items should be assessed by facility management to determine which items can be addressed and improved to increase the overall food security level of the facility.

This Food Security Evaluation is not intended, nor should be considered a "Certification" in regards to food security. Each facility participating in the Food Security Evaluation will receive a completed report and a Certificate of Participation.

Facilities are encouraged to review all applicable OSHA, safety, fire codes, and other regulations as a food security program is implemented to ensure these are not violated or otherwise hindered by the food security program.

SUMMARY SHEET

		Ideal	Fair	Weakness	N/A
1.0	Food Security Programs				
2.0	Outside Grounds and Roof				
3.0	Employee and Visitor Programs				
4.0	Material Receiving				
5.0	Facility Operations				
6.0	Finished Goods Storage/Shipping				
	TOTAL				

Name of Company: _____

Date: _____

Auditor: _____

EVALUATION CRITERIA

		Rating	Comments
1.0	**Food Security Programs**		
1.1	Operational Risk Management (ORM) program completed for facility. (Documented)		
1.2	Crisis management team established. (Documented)		
1.3	Product recall program in place. (Documented)		
1.4	Mock recalls conducted by crisis management team on six-month frequency. (Documented)		
1.5	Food security responsibilities assigned to a specific individual or team. (Documented)		
1.6	Food security inspection conducted of facility, grounds, and systems on at least a quarterly basis. (Documented)		
1.7	List of key regulatory and law enforcement contacts. (Documented)		
1.8	Program to ensure security of incoming mail and packages. (Documented)		
1.9	Program to protect and back-up computer systems and documentation critical to food safety. (Documented)		
1.10	Company controlled off-site warehousing, manufacturing, and distribution included in food security programs.		
1.11	Customer/consumer complaint program established and procedures to investigate alleged tampering issues. (Documented)		
1.12	Written procedures and policies in place for a contracted security service. (Documented)		

EVALUATION GUIDELINES

1.0 FOOD SECURITY PROGRAMS

1.1 Operational Risk Management (ORM) program completed for facility. (Documented)
Auditor should verify that an ORM program has been conducted and developed by the facility. Prior to development of this program the food procurement system and its distribution from its source should be described. A flow diagram should also be available. This ORM program should include all six elements of the program:

a) Identify hazards
b) Assess the risk
c) Analyze risk control measures
d) Make control decisions
e) Implement risk controls
f) Supervise and review.

Note: A Hazard Analysis Critical Control Point (HACCP) plan is not considered a food security assessment.

Note: Further details about ORM can be found in "Food Safety and Security: Operational Risk Management Systems Approach" November, 29, 2001, presented by *Department of Health and Human Services, U.S. Food and Drug Administration, Center for Food Safety and Applied Nutrition.*

Ideal: *All of the above elements have been completed and documented.*

Fair: *A food security assessment has been conducted and documented but does not include all elements of an ORM program. A Hazard Analysis Critical Control Point (HACCP) plan is not considered a food security assessment.*

Weakness: *No documentation maintained for an ORM or similar food security assessment of the facility.*

1.2 Crisis management team established. (Documented)
Auditor should verify that a crisis management team has been assembled at the facility. This team should include a sufficient number of members representing departments critical to the implementation of a food security program. Written procedures should be available to indicate the responsibilities of each member. A backup person should be listed for each member on the team. This team should have responsibility for managing the food security program, handling food security issues, and contacting regulatory, law enforcement, or media in the event of food security issues. Twenty-four-hour contact phone numbers or a replacement person and phone numbers should be listed for each member of the crisis management team.

Note: The number of team members and departments represented will be dependent upon the size and complexity of the facility being assessed.

Ideal: *A formal team has been established and written procedures in place to describe their responsibilities.*

Fair: *A team has been established, but written procedures are not in place, and/or a backup person is not listed for the team.*

Weakness: *No team has been established at the facility.*

1.3 Product recall program in place. (Documented)

Auditor should verify that a formal recall program has been established. This program should describe the steps to track materials (ingredients, packaging, and processing aides) from the point of receipt through to the finished product and first point of distribution, outside the facility's control. The recall program should identify a plant recall team (this can be the crisis management team), a listing of all supplier (including packaging) contacts with 24-hour contact numbers, and a listing of all first point of distribution customer 24-hour contact numbers.

Ideal: *A recall program, recall team, and contacts are established.*

Fair: *A recall program is established. The recall team is not formally listed, or some contacts are not provided for all raw material suppliers or customers. Contact information is outdated.*

Weakness: *Recall program is not documented.*

1.4 Mock recalls conducted by the crisis management team on a six-month frequency. (Documented)

Auditor should verify mock recalls have been conducted on a six-month frequency. These recalls should include raw materials (ingredients, packaging, and processing aides) and finished goods. The members present on the mock recall should be listed. Included also should be a mock recall summary indicating the length of time to complete recall, materials traced, supporting documentation, percent of materials recovered, issues noted during recall, and corrective action for any issues noted.

Ideal: *Mock recall conducted each six months and includes raw materials and finished goods to first point of distribution. Recall team was utilized and a summary provided.*

Fair: *Some of the above elements are missing, but a documented mock recall has been conducted in the last six months.*

Weakness: *It has been greater than six months since the previous mock recall or no documentation of the mock recall.*

1.5 Food security responsibilities assigned to a specific individual or team. (Documented)

Auditor should verify that responsibility for food security has been assigned. If food security has been assigned to a team of facility personnel, a trained leader should be designated to head the food security team and report to upper management. A trained

backup designate should be listed to replace the leader, in his or her absence. Written procedures should be developed for the food security team and proper training of the leader.

Note: A security service cannot be the food security team by itself but can be included in the food security team.

Ideal: *Food security has been assigned to an adequately trained individual or team.*

Fair: *A food security team evident but not documented.*

Weakness: *No evident food security team or no individual assigned responsibility.*

1.6 *Food security inspection conducted by facility personnel of facility, grounds, and programs on at least a quarterly basis. (Documented)*
Auditor should review previous food security inspection results. The audit should indicate members present, findings, responsibility for follow-up, corrective action, and completion dates. Frequency of these audits should be determined by the food security team to meet the needs of the individual facility but should not be greater than quarterly and conducted at the beginning of each season for seasonal operations.

Note: This can be combined with other inspections but should be clearly defined in the inspection program to indicate food security of the facility, grounds, and systems are evaluated. It would be suggested to make this an independent audit.

Ideal: *Food security audit conducted at least quarterly and documentation maintained of the audits as described in 1.6.*

Fair: *Audits conducted at least quarterly but follow-up not consistently provided for significant issues.*

Weakness: *Audits not conducted at least once per quarter or not conducted prior production for seasonal operations.*

1.7 *List of key regulatory and law enforcement contacts. (Documented)*
Auditor should verify a list of federal (EPA, FDA, USDA, FBI), state, and local contacts, such as police, fire, and emergency response teams, is available. This list should be kept current and immediately available, to appropriate facility personnel.

Ideal: *Above criteria is met.*

Fair: *Some essential or critical contacts missing from list.*

Weakness: *Several contacts are missing, or the list is not available.*

1.8 Program to ensure security of incoming mail and packages. (Documented)
Auditor should verify a written program exists to detail how the facility evaluates the security of incoming mail and packages. Procedures should be written to describe how suspect packages are to be handled. This program should include items received from the U.S. Postal Service and all private parcel services. Employees handling incoming mail and packages should be trained per these procedures. This training should be documented.

Note: The Centers for Disease Control have suggested guidelines available for handling incoming mail and packages.

Ideal: *A written program exists, covers all receipts, and pertinent employees trained.*

Fair: *Program in place but does not cover every package received, i.e., parcel services.*

Weakness: *No written program in place.*

1.9 Program to protect and backup computer systems and documentation critical to food safety. (Documented)
Auditor should review a documented system to back-up computer systems and documentation critical to food safety. At a minimum, this documentation should include food safety records required by regulatory, records pertinent to the plant's HACCP program, and records necessary to facilitate a recall program. Access to these records and/or computer systems should be restricted to authorized personnel. This restricted access system should be evaluated to determine if it is effective and the evaluation documented.

Ideal: *Access is adequately restricted to pertinent records in regards to food safety. Backup systems are in place for computer systems and documentation critical to food safety.*

Fair: *Access is restricted to pertinent records, but the backup systems do not effectively cover all food safety records.*

Weakness: *Access not restricted to pertinent food safety records or a backup system not in place for records or computer systems in regards to food safety.*

1.10 Company controlled off-site warehousing, manufacturing, and distribution included in food security programs (Documented)
Auditor should review a document that indicates any and all off-site warehousing, manufacturing, and distribution that is in the facility's control. Each location listed should be included in the facility food security programs, unless it is documented and proven that these locations have an independent food security program.

Example: An off-site warehouse is leased and operated by facility personnel. This should be included in the facility food security program.

Ideal: *All of above criteria are met.*

Fair: *Does not apply to 1.10.*

Weakness: *Document not available to indicate food security programs are in place for any and all off-site facility operations controlled by the main facility.*

1.11 Customer/consumer complaint program established and procedures to investigate alleged tampering issues (Documented)

Auditor should review a written customer/consumer complaint program. Documented corrective action should be provided by the facility for any alleged tampering issues reported. All complaints should be documented and maintained on file.

Ideal: *Written program in place, documented corrective action provided, and complaints kept on file.*

Fair: *Documented corrective action not provided for all alleged tampering issues.*

Weakness: *Program not in place or complaints not kept on file.*

1.12 Written procedures and policies in place for a contracted or in-house security service. (Documented)

Auditor should review written procedures and policies for a contracted or in-house security service, if utilized. These procedures and policies should include background checks, qualifications, designated duties and responsibilities of the security service, and supervision by designated facility personnel.

Ideal: *Written procedures and policies in place for the contracted or in-house security service. Supervision of the security service is designated to facility personnel*

Fair: *Written procedures and policies in place for the contracted or in-house security service. Supervision has not been assigned to designated facility personnel.*

Weakness: *Written procedures and policies not in place for the contracted or in-house security service.*

EVALUATION CRITERIA

		Rating	Comments
2.0	**Outside Grounds and Roof**		
2.1	Secured perimeters to restrict access to the facility and related outbuildings.		
2.2	Security cameras utilized at key locations around facility and outbuildings.		
2.3	Regular patrols conducted of outside grounds and roof area. (Documented)		
2.4	Access restricted and locked to roof, silos, outbuildings (with food safety sensitive materials), bulk storage tanks, bulk receiving stations, etc.		
2.5	Potential "hiding" places for persons or intentional contaminants are minimized.		
2.6	Adequate exterior lighting provided around outside grounds to include parking lots, doorways, loading docks, bulk storage areas, silos, etc.		
2.7	System in place to control and identify vehicles authorized to enter and/or park on premises. (Documented)		
2.8	Program in place to address any unusual security issues noted on outside grounds. (Documented)		
2.9	Entrances to facility are minimized and monitored.		
2.10	Metal or metal clad doors utilized on entrances to facility.		

EVALUATION GUIDELINES

2.0 OUTSIDE GROUNDS AND ROOF

2.1 Secured perimeters to restrict access to the facility and related outbuildings.
Auditor should conduct an audit of the outside grounds. A chain-link fence or other suitable barrier (sufficiently restricting unauthorized access) should be provided for loaded transport vehicles and production plant buildings. Any outbuilding containing food ingredients, packaging, or other food safety sensitive items should be included in this or a separate secured perimeter. All gates or entrances in the fence should be locked, require a key, electronic access or code for opening, or be staffed to monitor entering persons or vehicles.

Ideal: *Entire grounds secured by a fence or barrier, all out buildings included in this or a separate perimeter, and all access monitored and/or locked 24 hours per day as described above.*

Fair: *Outside perimeters are fenced. . Main entrances are staffed or gated (keys or codes) from dusk to dawn but not staffed or gated to monitor traffic and persons during daylight hours.*

Weakness: *Any areas of the building perimeter not fenced or otherwise secured. Entrances other than main entrances not locked or monitored. Outbuildings with food safety-sensitive materials not appropriately secured.*

2.2 Security cameras utilized at key locations around facility and outbuildings.
Auditor should review a facility schematic of the outside grounds. This schematic should identify all entrances to the building, accesses to the roof, and sensitive areas (bulk storage tanks, bulk loading/unloading areas, etc.). The facility should indicate which areas are deemed sensitive and provide security cameras to monitor these areas. These Closed Circuit Television Cameras (CCTV) should be recorded. The recording medium should be retained for a minimum of thirty days. If tapes are utilized, they should be replaced on a regular basis.

Note: An unlocked gate, unlocked access to roof, main entrances, and material storage systems should be considered sensitive and cameras provided.

Ideal: *Security cameras provided at entrances and sensitive areas and tapes are recorded and maintained for at least thirty days.*

Fair: *Security cameras present but do not cover all sensitive areas or entrances. Security camera tapes are recorded and maintained for at least thirty days.*

Weakness: *Security cameras not utilized outside the facility. Security camera are not recorded or maintained for at least thirty days.*

2.3 Regular patrols conducted of outside grounds and roof area. (Documented)
Auditor should verify that plant has established a regular patrol of outside grounds, outbuildings, and roof. This patrol should be conducted by a designated individual(s) trained in security. The patrols should be conducted on a regular (minimum twice daily) and random basis. The patrols should be documented and suspicious activity investigated with law enforcement notified as deemed appropriate by the designated individual. Written policies and procedures should be developed for these patrols.

Ideal: *Documented patrols conducted twice per eight-hour shift at random hours by trained individual(s) of all above-mentioned areas. Written policies and procedures are developed for these patrols.*

Fair: *Patrols only conducted daily or not at random hours. Written policies and procedures not developed for these patrols.*

Weakness: *Patrols conducted less than daily or not documented.*

2.4 Access restricted and locked to roof, silos, outbuildings (with food safety-sensitive materials), bulk storage tanks, bulk receiving stations, etc.
Auditor should verify that access is restricted and locked to above-mentioned areas. Locked access may consist of keyed locks, codes, key cards, etc. A schematic should be available from the facility to identify these areas. Auditor should verify that all areas are listed on the schematic. Keys should be collected from the employee upon termination, layoff, or otherwise leaving the company. Codes should also be changed to these areas when a person with knowledge of these codes is no longer an employee of the company.

Note: It would be suggested to account for all keys and to rotate and/or change access codes on a regular basis.

Ideal: *Access is restricted and locked to such areas and a program is in place to collect keys or changes codes upon an employee leaving the company.*

Fair: *Does not apply to 2.4.*

Weakness: *Any such areas which are not restricted and have locked access. Keys are not collected or codes changed upon departure of an employee with access to these areas.*

2.5 Potential hiding places for persons or intentional contaminants are minimized.
Auditor should inspect the outside grounds for such areas. Vegetation should be kept trimmed and maintained. Shrubbery should be maintained at three feet or less or the bottom branches trimmed no less than six feet off the ground for trees or bushes. Unused equipment, pallets, empty drums, totes, etc. should be kept away from the building and perimeter fencing until removed from the property. Any unused items should be removed on a regular basis or stored in an outbuilding.

Note: These guidelines should apply to any materials, vegetation, or shrubbery within the facility's outer secured perimeter.

Ideal: *Potential hiding places minimized to the fullest extent possible as described in guidelines.*

Fair: *Facility has made significant efforts to minimize potential hiding places, but a limited number of areas still exist, e.g., empty pallets near building, a few bushes or trees not properly trimmed.*

Weakness: *Several hiding places remain around the facility or other outbuildings.*

2.6 *Adequate exterior lighting provided around outside grounds to include parking lots, doorways, loading docks, bulk storage areas, silos, etc.*
Auditor should verify that lighting has been provided for such areas. It is recommended these lights be controlled by photoelectric cells. If possible, auditor should determine if existing light fixtures are operative.

Note: The use of lighting around the facility should be done in a method to not be a significant insect attractant to the building. Lights should be shown onto buildings, when possible, to draw insects away. The type of lighting utilized should also be evaluated.

Auditor note: The above note should not be evaluated in rating this item.

Ideal *Lighting provided at above-mentioned areas.*

Fair: *Lighting provided at most areas, but a few areas not covered.*

Weakness: *Several of above-mentioned areas not covered.*

2.7 *System in place to control and identify vehicles authorized to enter and/or park on premises. (Documented)*
Auditor should verify the system in place at the facility and that it accounts for any vehicles entering the plant property, e.g., visitors, delivery and shipping vehicles, employees, management, etc. Vehicles entering the facility grounds should be provided with an identification decal or other appropriate item in the vehicles. It would be preferred that all vehicles pass a manned guard station or locked gate where a code, pass, or intercom is required to operate the gate. Traffic routes should be restricted to designated parking areas for all vehicles. Employees should be discouraged from parking outside designated lots. All delivery vehicles should be restricted to appropriate areas. Designated spaces should be provided for visitor vehicles to keep them centralized and in highly visible areas.

Ideal: *Identification in all vehicles, all vehicles enter a controlled entrance, and designated parking and traffic routes identified.*

Fair: *Only two of three above-mentioned items provided.*

Weakness: *One or none of above items provided.*

2.8 Program in place to address any unusual security issues noted on outside grounds. (Documented)

Auditor should verify that a written procedure exists to describe the steps in place to address unusual security issues. This procedure should include contacts and telephone numbers. This procedure should be available to the person(s) conducting the security patrols. A log should be maintained to document all unusual security issues and follow-up provided. These security issues should be reviewed by the Food Security Team and documented.

Ideal: *Written procedure and log available.*

Fair: *Does not apply to 2.8.*

Weakness: *Procedure or log not available.*

2.9 Entrances to facility are minimized and monitored.

Auditor should verify that the facility has minimized normal routes of travel for personnel entry/exit to a reasonable number that can be effectively monitored by the facility. Any normal routes (unlocked or unalarmed) of personnel entry/exit should be monitored on a continuous basis to ensure unauthorized persons are not permitted access. Monitoring may be accomplished by staffing or electronic access control. These entrances should include employee, visitor, contractor, truck drivers, etc.

Ideal: *All unlocked entrances are monitored to ensure only authorized persons are allowed entry.*

Fair: *Does not apply to 2.9.*

Weakness: *Any unlocked entrances to the facility that are not monitored.*

2.10 Metal or metalclad doors utilized on entrances to facility.

Auditor should verify that metal or metalclad doors are utilized to the extent possible at the facility. Use of such doors may vary greatly dependent upon the facility type. However, efforts should be made to provide such doors on all entrances when the facility is not in operation. During operation, such doors should be provided where unmonitored entrances are present in the facility to limit the concern for forced entry. All doors should be in a good state of repair and inspected regularly for integrity of operation.

Ideal: *Metal or metalclad doors provided on all non-monitored entryways during operation. Metal or metalclad doors provided on all entryways during nonoperation.*

Fair: *Does not apply to item 2.10.*

Weakness: *Screen doors or other easily penetrable doors utilized on unmonitored doorways during operation or nonoperation.*

EVALUATION CRITERIA

		Rating	Comments
3.0	**Employee and Visitor Programs**		
3.1	Formal prehiring screening program in place for all employees and contracted persons. (Documented)		
3.2	No employees or contracted individuals working without prehiring screening program completed and approved. (Documented)		
3.3	Positive identification and recognition system in place for all employees entering the facility.		
3.4	System in place to restrict employee access inside and outside of facility to authorized areas.		
3.5	Employee training program in place to cover food security, including identification of potential signs and evidence of tampering. (Documented)		
3.6	Traffic patterns restricted to welfare areas for arriving employees.		
3.7	Employee welfare areas provided for storage of personal belongings.		
3.8	No evidence of personal belongings outside of designated areas.		
3.9	Formal uniform or outer garment program. (Documented)		
3.10	Employees not allowed outside of facility or designated outside break areas during work hours.		
3.11	Employee lockers in locker rooms and other personal storage areas inspected on a regular basis.		
3.12	Visitors, contractors, guests, etc. report to a designated entrance and sign in.		

		Rating	Comments
3.0	**Employee and Visitor Programs (cont'd)**		
3.13	Facility policies provided to visitors, contractors, guests, etc. and plant issued identification provided with date of issue and expiration.		
3.14	Visitors, contractors, guests, etc. comply with the company dress policy.		
3.15	Formal program to accompany visitors in facility and verify access to food sensitive areas.		

EVALUATION GUIDELINES

3.0 EMPLOYEE AND VISITOR PROGRAMS

3.1 Formal prehiring screening program in place for all employees and contracted persons. (Documented)

Auditor should verify that a written screening program is in place for all employees, including management, seasonal employees, temporary, and contracted services, e.g., pest control, cleaning, maintenance contractors, etc. Any persons not included in this prehiring screening program should be covered by the facility visitor policy discussed in section 3.12. This screening process should include addresses and telephone numbers of applicants and verified work references. Employees and others defined above should not be allowed to work in the facility prior to obtaining addresses and telephone numbers of the applicants and verified work references. This screening process may also include drug testing, criminal background checks, Federal Bureau of Investigation Watch List, immigration status checks, etc. The facility should determine and document what is necessary in regards to "satisfactory" results from the screening process.

Note: State and local laws should be consulted in regard to performance of these various checks regarding potential discrimination or privacy issues.

Ideal: *A screening program in place for all employees and contracted persons prior to employment. Program includes checks of telephone number and addresses of applicants, verified work references, and at least two of the additional items specified above.*

Fair: *Screening only monitors telephone number and addresses of applicants and verified work reference checks prior to employment.*

Weakness: *Program allows employee or contracted person to work prior to completion of facility screening program. No screening program in place.*

3.2 No employees or contracted individuals working without pre-hiring screening program completed and approved. (Documented)

Auditor should verify that at least four individuals in the facility have been screened. At least one should be of a contracted individual, if utilized at facility. Facility should provide proof the screening program has been completed for these individuals.

Note: This item should be rated as a Weakness if 3.1 was rated as a Weakness.

Ideal: *Screening program verified of four or more chosen individuals.*

Fair: *Does not apply to item 3.2.*

Weakness: *Screening program not proven and documented for any of four or more individuals chosen.*

3.3 Positive identification and recognition system in place for all employees entering the facility.

Auditor should verify a positive identification and recognition system is in place. The identification system should include a badge with the individual's name and picture identification. All employee entrances should be locked or manned. The recognition system may be conducted by utilizing a magnetic stripe on the badges, security coded locks, guards at entryways, or other means to recognize entering employees. The system utilized should be able to track which employees are present at all times in the facility. Employees should not bypass this system by using unauthorized entrances or entrances opened from the interior by other employees. Once employees have entered the facility, a positive picture identification method shall be visible on the employee at all times.

Ideal: *Picture identification badges with names provided and worn by employees. A positive recognition system in place at the employee entrances.*

Fair: *Picture identification badges with names provided. A positive recognition system not in place at employee entrances.*

Weakness: *Badges with picture identification and names not provided for all employees.*

3.4 System in place to restrict employee access inside and outside of facility to authorized areas.

Auditor should verify that a system is in place to designate access to sensitive areas to authorized individuals. This system should include the interior and exterior of facility. The employee badges should indicate the areas of authorization in which they are authorized. A method should be developed by the facility to monitor employees entering sensitive areas. This monitoring could be accomplished with locked doorways, electronic access control, security cameras, authorized staff present in these restricted areas, etc.

Ideal: *Sensitive areas identified, badges indicate areas of authorization, and system to monitor entry to these areas.*

Fair: *Sensitive areas identified and badges indicate areas of authorization. No formal system to continuously monitor entry to these areas.*

Weakness: *Sensitive areas not identified, badges do not indicate areas of authorization, unauthorized employees present in restricted areas.*

3.5 Employee training program in place to cover food security, including identification of potential signs and evidence of tampering. (Documented)

Auditor should verify a written program is developed to address food security rules at the facility. This should be a documented program with documentation maintained of the completed training for each individual at the facility. This program should include plant specific rules, signs and evidence of tampering, and reporting instructions in event of food security issues (threats, chemical spills, wrong doing, etc.).

Ideal: *Written program and documentation provided for employee training.*

Fair: *Written program and documentation provided, but missing elements in program listed above.*

Weakness: *No program or documentation.*

3.6 *Traffic patterns restricted to welfare areas for arriving employees.*
Auditor should verify that arriving employees travel from the employee entrance to designated break or locker room areas. Employees should not have access or be allowed to enter production, warehouse, maintenance shops, laboratories, or other nonbreak areas while entering the facility and prior to placing personal belongings in designated storage areas and donning appropriate work apparel. Office personnel working in offices not located in above-mentioned areas would not have to enter designated break or lockers rooms upon arrival, as long as their route of travel did not pass through any of these above-mentioned areas.

Ideal: *Employees are required to enter designated break or locker areas and do not travel in production, warehouse, maintenance shops, laboratories, or other non-break areas when entering the facility.*

Fair: *Employees travel to designated break or locker areas upon entering the facility but travel through nonopen product areas to reach these break or locker areas.*

Weakness: *No designated traffic patterns for entering employees or employees have access to food production areas during arrival.*

3.7 *Employee welfare areas provided for storage of personal belongings.*
Auditor should verify employee welfare areas are provided in an area outside of production, warehouses, maintenance shops, laboratories, or other sensitive food areas. Individual lockers should be provided in these welfare areas for storage of personal belongings. Company owned locks should be provided for employee lockers. The facility should develop a written policy as to what type of items are or are not allowed in personal lockers.

Ideal: *Individual lockers provided in a designated locker room area and written policy in place as to what type of items may or may not be stored in lockers.*

Fair: *Employee welfare area provided, but individual lockers not provided for all employees.*

Weakness: *Segregated employee welfare areas not provided outside of production, warehouses, maintenance shops, laboratories, or other sensitive food areas.*

3.8 No evidence of personal belongings outside designated areas.
Auditor should verify personal belongings are not outside the designated employee welfare area. Plant rules should not allow any personal belongings outside the designated area or to be carried on the individual during their shift. This rule should be applied to all personnel, including management. This would include storage of items or carrying them on the individual. Examples would include personal knives, tobacco paraphernalia, medications, personal food, etc.

Note: An exception to this rule may be a medication required to be with the individual. The individual should provide a written notice from a licensed doctor (or similar person) of the condition and item to be carried. The facility should develop a program to monitor and account for these individuals and materials.

Ideal: *A plant rule addresses personal belongings and no evidence noted in the facility or on individuals.*

Fair: *Plant rule addresses personal belongings but minor evidence of personal belongings noted in non-production or non-food sensitive areas.*

Weakness: *No plant rule, significant evidence of personal items in nonproduction areas, or any evidence of personal belongings in production or food sensitive areas.*

3.9 Formal uniform or outer garment program. (Documented)
Auditor should verify a written uniform or outer garment program is established at the facility. At a minimum, street clothing should not be exposed to open product areas. It would be preferred that a uniform policy be established for all employees entering production, warehouse, or other product areas. Employees should be provided with uniforms or smocks at the facility. These uniforms or smocks should not be worn outside the facility, except to designated outside break areas, or to perform a facility-related duty, e.g., inspecting a received truck. These uniforms should be laundered by the facility or designated service and be stored at the facility after laundering. These uniforms or smocks should not be worn to and from work. Uniforms or smocks should not be allowed between raw and finished product areas where potential cross-contamination concerns may be present, e.g., raw and cooked meats. Designated uniforms and smocks should also be provided for laboratories where any type of microbiological testing is completed or other hazardous reagents are utilized.

Ideal: *Outer garment policy established for all employees and uniforms not worn outside the facility, except for designated tasks. Concern for cross-contamination issues are not present with uniforms or smocks between various areas of the facility.*

Fair: *Outer garment policy established for employees in open product areas. Outer garment policy not established for entire facility.*

Weakness: *Outer garment policy not established for employees in open product areas. Outer garments allowed outside the facility for non-facility-related tasks. Outer garments worn to and from work. Any signs of potential cross-contamination between raw and finished product areas.*

3.10 Employees not allowed outside of facility or designated outside break areas during work hours.

Auditor should verify that a plant policy exists to restrict employees from leaving the facility or designated outside break areas during their shift. If an employee must leave and return during their shift, the facility entry/exit policies should be followed to include no company uniforms outside the facility. Designated employees should be restricted to normal job duties on the outside of the facility while wearing the company garment. Employees should not be allowed to take lunch or smoking breaks in personal vehicles.

Note: Office personnel, as described in item 3.6, may be exempt from this policy.

Ideal: *Employees do not leave the facility for non-company-related tasks without following regular entry/exit criteria.*

Fair: *Does not apply to item 3.10.*

Weakness: *Any employee leaving designated areas or work tasks outside the facility, without following regular entry/exit policies while wearing the company garment. No formal policy.*

3.11 Employee lockers in locker rooms and other personal storage areas inspected on a regular basis.

Auditor should verify that lockers and other personal storage areas are inspected. The facility should inspect the lockers against the list as described in item 3.7. The facility should provide documentation that lockers and storage areas have been inspected at least monthly. The facility should develop a system to assign lockers to individuals and ensure any terminated or other leaving persons' lockers are cleaned out and inspected immediately, within that shift.

Ideal: *Employee lockers inspected at least monthly and documented. System developed to assign employees to lockers and terminated or other leaving person's lockers have been cleaned out and inspected.*

Fair: *Employee lockers inspected less frequently than monthly, but at least quarterly and documented. System developed to assign employees to lockers.*

Weakness: *Lockers inspected less than quarterly, no system to assign employees to lockers, lockers cleaned out later than the shift an employee leaves or is terminated.*

3.12 Visitors, contractors, guests, etc., report to a designated entrance and sign in.

Auditor should verify that a program is in place to track all visiting persons (nonemployees) at the facility. The visitor program should cover any person not accounted for in the regular plant monitoring program. This could include visitors, inspectors, contractors, guests, sales, customers, etc. A logbook should be maintained of these visitors entering and leaving the facility. The logbook should indicate the name of visitor, company represented, reason for visit, person visited, time in, and time out. The person visited or a designate should be responsible to ensure the visitor follows

appropriate rules and guidelines and has documented the logbook properly. The logbook should be maintained for at least six months.

Note: The auditor should review the program and verify that any visitors noted during the tour have signed in the logbook.

Ideal: *A formal visitor program established. All visitors have signed in and document all required information in the logbook. The logbook is maintained for at least six months.*

Fair: *Visitor logbook maintained, times of entry and exit not documented. The logbook is not maintained for at least six months.*

Weakness: *Logbook not maintained. Any visitors present and not signed in the guest book.*

3.13 Facility policies provided to visitors, contractors, guests, etc. and plant-issued identification provided with the date of issue and expiration.
Auditor should verify a written list of visitor plant policies is available at the facility. Documentation should be provided to indicate the visitors have reviewed and understand the plant policies. Upon receiving the plant policies, a plant-issued identification badge with date of issue and expiration should be given to the visitor and required to be displayed at all times. This program should be followed by any and all visitors arriving at the facility to include maintenance, office, and outside grounds personnel, etc. Plant personnel should verify government issued photo visitor identification prior to issuing the badge. Upon the visitor leaving the premises, the plant-issued identification should be collected. Verification should be conducted each day to ensure all plant issued badges have been collected.

Ideal: *Visitor policies issued, documentation of receipt of these policies, government issued photo identification checked, plant identification provided, and all identification collected upon leaving the premises.*

Fair: *Visitor policies issued, plant identification provided, but no documentation that visitor policies were received.*

Weakness: *Any visitors present without plant identification, visitor program not in place, visitor passes not accounted for each day.*

3.14 Visitors, contractors, guests, etc., comply with the company dress policy.
Auditor should verify that all visitors entering production, warehouse, or other product areas are complying with the company uniform policy described in 3.9. Any visitors entering production, warehouse, or other product areas in the facility should be required to wear a uniform, smock, or other appropriate facility provided garment.

Ideal: *All visitors in production, warehouse, or other product areas comply with the facility uniform policy.*

Fair: *Visitors do not comply with the dress policy in unexposed product areas.*

Weakness: *A visitor dress policy not in place. Any visitor in an exposed product area not wearing proper facility provided outer garments.*

3.15 *Formal program to accompany visitors in facility and verify access to food-sensitive areas.*

Auditor should verify a program exists to accompany all visitors in food-sensitive areas, as determined by the facility. Visitors and guests should only be permitted to be unaccompanied in food-sensitive areas when the formal screening programs described in 3.1 have been completed for that visitor. This would apply when a visitor will be working for an extended period of time in the facility.

Note: The facility must receive an Ideal rating on item 3.1 for the screening program to be applied to visitors and unaccompanied in food-sensitive areas.

Ideal: *Program in place to accompany all visitors or screen them prior to entry in food-sensitive areas.*

Fair: *Does not apply to 3.15.*

Weakness: *Formal visitor accompanying program not in place. Any visitors unaccompanied in food-sensitive areas without documented screening.*

EVALUATION CRITERIA

		Rating	Comments
4.0	**Material Receiving**		
4.1	Suppliers provide evidence of food security programs. (Documented)		
4.2	Supplier (continuing) guarantees on file for all ingredients and packaging.		
4.3	Formalized ingredient and packaging testing programs are in place (in-house testing, outside testing, or certificates of analysis). (Documented)		
BULK RECEIVED MATERIALS (INGREDIENTS, CHEMICALS, GASES, ETC.) IF N/A, GO TO 4.12			
4.4	Written procedures in place to cover receipt of all bulk materials. (Documented)		
4.5	Arrival of truck at facility verified and driver identification verified. (Documented)		
4.6	Bill of lading and receiving documents verified. Should include material name, amount, amount of seals, and seal numbers.		
4.7	Truck and trailer inspection conducted by trained facility personnel. (Documented)		
4.8	Unloading equipment (hoses, pipes, caps, augers, etc.) is secured and inspected prior to use.		
4.9	Unloading process is conducted in a secured area or monitored during entire process.		
4.10	Trailer is inspected after unloading and all unloading equipment resecured.		
4.11	Amount of product received is verified against the receiving document.		
NONBULK RECEIVED MATERIALS			
4.12	Written procedures in place to cover receipt of all received materials. (Documented)		
4.13	Arrival of truck at facility verified and driver identification verified. (Documented)		

		Rating	Comments
4.0	**Material Receiving (cont'd)**		
4.14	Bill of lading and receiving documents verified. Should include material name, amount of material, amount of seals, seal numbers, lot numbers, etc.		
4.15	Truck and/or trailer inspection conducted by trained facility personnel before and after unloading. (Documented)		
4.16	Product(s), amount, labels, lot numbers, etc. verified at time of receipt. (Documented)		
4.17	Procedures in place for handling damaged or rejected materials. (Documented)		
4.18	Less-than-load (LTL) shipments have a food security system in place. To include ingredients, maintenance, sanitation, pest control, laboratory, and other received items.		
4.19	Written procedures to address quarantine and release, irregularities in amounts outside a predetermined range, evidence of tampering, or counterfeiting of goods received.		
4.20	Tamper-resistant/-evident packaging required for received materials, when feasible.		

EVALUATION GUIDELINES

4.0 MATERIAL RECEIVING

4.1 Suppliers provide evidence of food security programs. (Documented)
Auditor should verify a listing of ingredient and packaging suppliers. Documentation should be provided to indicate a food security evaluation (verification of security measures) has been conducted of their facilities and/or distribution centers.

Ideal: *All ingredient and packaging suppliers provide evidence of food security program.*

Fair: *All bulk ingredient suppliers and direct-contact packaging suppliers and more than 75% of all food ingredient suppliers provide evidence of a food security program.*

Weakness: *Criteria of Fair category not met.*

4.2 Supplier (continuing) guarantees on file for all ingredients and packaging.
Auditor should verify that a supplier (continuing) guarantee is on file for all ingredients and packaging materials. A listing should be provided of all ingredients and packaging and this list reviewed on a quarterly basis to ensure no new suppliers have been approved without obtaining this guarantee. The auditor should review the list and pick four ingredients and two packaging materials during the audit to verify these are on the list and guarantees are provided.

Note: The supplier (continuing) guarantee should reference compliance with federal regulations, guidelines, or Defect Action Levels of raw materials and ingredients.

Ideal: *A list provided and guarantees on file for all ingredients and packaging materials.*

Fair: *A list provided, but not updated at least quarterly. Guarantees not on file for non-direct contact packaging.*

Weakness: *A list not provided. Guarantee not on file for an ingredient or direct-contact packaging material.*

4.3 Formalized ingredient and packaging testing programs are in place (in-house testing, outside testing, or certificates of analysis). (Documented)
Auditor should verify a formalized ingredient and packaging testing program has been established. The facility should show that an evaluation has been conducted to ensure that appropriate testing is conducted to monitor for possible microbiological, chemical, or physical contaminants. This testing should be conducted on a schedule deemed appropriate by the facility.

Note: The testing programs and frequencies may be determined by applicable food safety programs, e.g. HACCP.

Ideal: *Evidence is provided that the facility has conducted an ingredient and packaging assessment to determine the types and frequency of testing. Testing is conducted per the facility schedule.*

Fair: *Some incoming ingredients and packaging are tested, but evidence cannot be provided to indicate an evaluation of all ingredients and packaging.*

Weakness: *No evidence that an ingredient and packaging assessment has been conducted to determine testing types and frequencies. Testing not conducted on the frequency as deemed necessary in the facility evaluation program.*

BULK RECEIVED MATERIALS (INGREDIENTS, CHEMICALS, GASES, ETC.)
IF N/A, SKIP TO ITEM 4.12

4.4 *Written procedures in place to cover receipt of all bulk materials. (Documented)*
Auditor should verify written procedures are in place to cover receipt and inspection of all bulk materials received. This would include dry and liquid ingredients, chemicals, gases, etc. These procedures should include pertinent food security guidelines covered from 4.5 to 4.11.

Ideal: *Procedures in place for all bulk items received at facility and cover all points addressed in 4.5 to 4.11.*

Fair: *Procedures in place for all bulk items received, but one element from 4.5 to 4.11 missing in the procedure.*

Weakness: *Two or more elements from 4.5 to 4.11 missing in the written procedures. Written procedures not available for any bulk goods received at the facility.*

4.5 *Arrival of truck at facility verified and driver identification verified. (Documented)*
Auditor should verify that procedures exist to verify the truck and driver identification at the facility. Trucks or other delivery vehicles should be restricted from the premises, unless positive identification is made of the shipment. Government issued photo identification should be provided by the driver and the driver's name matched to documents provided by the supplier of the goods or other suitable documents. Shipments with more than one driver between the supplier and the customer should have all drivers listed on the documents. Nondrivers should be restricted to the cabs of the vehicles, while on facility property.

Ideal: *Positive identification made of the truck and driver prior to entering facility grounds.*

Fair: *Positive identification made of the truck and driver after truck enters facility grounds.*

Weakness: Positive identification of the truck and driver not made prior to unloading. No formal procedures exist to identify the truck or driver.

4.6 Bill of lading and receiving documents verified. Should include material name, amount of material, amount of seals, and seal numbers.

Auditor should verify that a policy exists to review the bill of lading and receiving documents prior to receipt. The bill of lading should identify the material name, amount of material, amount of seals present, and unique seal numbers. Any hatches, unloading ports, vents, or other points of entry into these trailers should be sealed by the supplier. These checks by facility personnel should be documented. This may not be feasible for open top trailers, such as vegetable haulers to a canning facility. In this case, the facility and trucking service should demonstrate (document) that an effective program exists to maintain control of that trailer from the farm to receipt at the facility.

Ideal: Bill of lading and receiving documents are reviewed prior to receipt and indicate above-mentioned criteria. No products are shipped in open trailers.

Fair: Products shipped in open trailers, but an effective program is in place to maintain control of the trailer from the supplier to the receiving facility.

Weakness: Bill of lading or receiving documents not verified. Material name, amount, amount of seals, and/or seal numbers not listed on receiving documents.

4.7 Truck and trailer inspection conducted by trained facility personnel. (Documented)

Auditor should verify that truck and trailer inspections are conducted and documented by trained personnel. Evidence should be provided to indicate the person has been trained per the written procedures discussed in 4.4. These documented inspections should indicate that the criteria in 4.5 to 4.11 are conducted.

Ideal: All required criteria is inspected for and documented by trained personnel.

Fair: One of the required items listed in the above elements is not documented.

Weakness: Inspections are not documented, not conducted by trained personnel, and/or more than one criteria is missing from the trailer inspections.

4.8 Unloading equipment (hoses, pipes, caps, augers, etc.) is secured and inspected prior to use.

Auditor should verify that any unloading equipment is locked and sealed and inspected prior to use for receipt of materials. These seal numbers should be documented and checked at each removal and replacement, and all numbers documented on a log. Securing the equipment should be conducted by restricting access and locking the equipment to limit the introduction of potential contaminants. The equipment should be inspected prior to use by trained personnel and this inspection documented.

Ideal: *All unloading equipment for bulk materials is locked and sealed to limit possible tampering issues, inspected prior to use and documented.*

Fair: *Unloading equipment is locked and sealed and inspected prior to use, but the inspections are not documented.*

Weakness: *Unloading equipment is not locked and sealed. Unloading equipment is not inspected prior to use.*

4.9 *Unloading process is conducted in a secured area or monitored during entire process.*
Auditor should verify unloading of bulk materials is conducted in a secured area to limit access by unauthorized persons, or unloading of the bulk goods is monitored by trained personnel during the entire process.

Ideal: *Unloading area is secured or monitored during entire process.*

Fair: *Does not apply to 4.9.*

Weakness: *Unloading process is not monitored or secured during entire process.*

4.10 *Trailer is inspected after unloading and all unloading equipment resecured.*
Auditor should verify that formal policies are in place to inspect the trailers after unloading. The trailers should be inspected for possible contaminants that may not have been visible with contents in the trailers and this inspection documented. All unloading equipment should be resecured and/or locked after use to limit unauthorized access. Securing of this equipment should be documented.

Ideal: *Trailers are inspected after unloading, inspections documented, and all unloading equipment secured and/or locked.*

Fair: *Does not apply to 4.10.*

Weakness: *Trailers are not inspected after unloading, unloading equipment not secured after use, and/or posttrailer inspections not documented.*

4.11 *Amount of product received is verified against the receiving document.*
Auditor should verify that program is in place to verify the amount of goods received with the receiving document. This should be conducted for all bulk liquid or dry goods received. This could be accomplished by the use scales, meters, before and after weights of trucks, etc. These checks should be documented. Procedures should be in place to address irregularities in amounts outside a predetermined range.

Ideal: *Program to verify the amount of goods received in regard to the receiving documents. Procedures in place to address irregularities.*

Fair: *Amounts verified of ingredients but not conducted for non-ingredient materials.*

Weakness: Amounts not verified of ingredients. Procedures not in place to address irregularities in amounts outside a predetermined range.

NONBULK RECEIVED MATERIALS

4.12 Written procedures in place to cover receipt of all received materials. (Documented)
Auditor should verify that written procedures are in place to cover receipt and inspection of all nonbulk materials received. This would include ingredients, packaging, maintenance, and sanitation chemicals, etc. These procedures should include pertinent food security guidelines covered from 4.13 to 4.18. Elements 4.13 to 4.18 should be applied, as appropriate, to any non-food-related ingredient or packaging received. When it is not feasible to apply these guidelines to various goods received by mail, UPS, etc., section 1.8 should be applied to these goods.

Ideal: Procedures in place for all non-bulk items received at facility and cover all points addressed in 4.13 to 4.18.

Fair: Procedures in place for all non-bulk items received, but one element from 4.13 to 4.18 missing in the procedure.

Weakness: Two or more elements from 4.13 to 4.18 missing in the written procedures. Written procedures not available for any goods received at the facility.

4.13 Arrival of truck at facility verified and driver identification verified. (Documented)
Auditor should verify that procedures exist to verify the truck and driver identification at the facility. Trucks or other delivery vehicles should be restricted from the premises, unless positive identification has been made of the shipment. The driver should provide government issued photo identification and this matched to documents provided by the supplier of the goods or other suitable documents.

Ideal: Positive identification made of the truck and driver prior to entering facility grounds.

Fair: Positive identification made of the truck and driver after truck enters facility grounds.

Weakness: Positive identification of the truck and driver not made prior to unloading. No formal procedures exist to identify the truck or driver.

4.14 Bill of lading and receiving documents verified. Should include material name, amount of material, amount of seals, seal numbers, lot numbers, etc.
Auditor should verify that a policy exists to review the bill of lading and receiving documents prior to receipt. The bill of lading should identify the material name, amount of material, amount of seals present, unique seal numbers, lot numbers of the goods, etc. The supplier should seal all points of entry into these trailers. These checks by facility personnel should be documented.

Note: Items received by Less-Than-Load shipments are covered in 4.18.

Ideal: *Bill of lading and receiving documents are reviewed prior receipt and indicate above-mentioned criteria.*

Fair: *Does not apply.*

Weakness: *Bill of lading or receiving documents not verified. Material name, amount of material, amount of seals, seal numbers, and/or lot numbers not listed on receiving documents.*

4.15 Truck and/or trailer inspection conducted by trained facility personnel before and after unloading. (Documented)
Auditor should verify that formal policies are in place to inspect the truck and/or trailers before and after unloading. Trained individuals should conduct the inspections. Documentation should be maintained that indicates the receiving individuals have been trained per the procedures in 4.12. The trucks and/or trailers should be inspected for possible contaminants, evidence of tampering, unusual conditions, etc., during these inspections and documented.

Note: Trailer refers to a detached unit from the cab. Truck refers to a vehicle where the goods are hauled in area accessible from the cab of the vehicle.

Ideal: *All required criteria is inspected for and documented by trained personnel.*

Fair: *One of the required items listed in the above elements is not documented.*

Weakness: *Inspections are not documented, not conducted by trained personnel, and/or more than one criterion is missing from the trailer inspections.*

4.16 Product(s), amount, labels, lot numbers, etc. verified at time of receipt.
Auditor should review a program utilized by the facility to verify the product(s), amounts, labels, lot numbers, etc are verified at the time of receipt. This should be listed in the procedures described in 4.12.

Ideal: *Program is utilized and product(s), amounts, labels, lot numbers, etc., verified.*

Fair: *Does not apply to 4.16.*

Weakness: *Program not utilized. Product(s), amounts, labels, and/or lot numbers are not verified.*

4.17 *Procedures in place for handling damaged or rejected materials. (Documented)*
Auditor should verify the facility has a procedure for handling any damaged or rejected materials found at the time of receipt. Any materials received in compromised containers should be appropriately handled. This would include any taped repairs, opened containers, damaged containers, etc. It is recommended to not accept any materials in

which the container has been damaged prior to facility handling. Efforts should be made not to accept these materials into the facility in an effort to limit the potential spread of contaminants. If damaged materials must be held at the facility, a designated area should be provided until appropriate disposition is made and the materials can be removed.

Ideal: *Damaged and rejected materials appropriately handled. These goods are not accepted into the facility. Employees are aware of the program*

Fair: *Damaged and rejected materials appropriately handled. These goods are brought into the facility, but restricted to designated areas until a disposition is determined.*

Weakness: *Damaged materials are accepted at facility. Damaged or rejected materials are not segregated to a designated area.*

4.18 *Less-than-load (LTL) shipments have a food security system in place. To include ingredients, maintenance, sanitation, pest control, laboratory, and other received items.* Auditor should verify a formal program is in place to evaluate items received on LTL loads. Goods not covered in items 1.8 or 4.12 should be covered in this program. A food security system should be in place for transporters of LTL goods. The facility should verify this system with the carriers and implement inspection criteria covered in 4.13 to 4.17. Documentation should be maintained of these inspections conducted.

Ideal: *Program in place to cover goods received on LTL loads and documented inspections conducted.*

Fair: *Food security system not verified of LTL transporters, but food security inspections are conducted of these vehicles and goods at the time of receipt at facility.*

Weakness: *Food security inspections not conducted of LTL transporters and goods received at facility, which are not covered in 1.8 or 4.12.*

4.19 *Written procedures to address quarantine and release, irregularities in amounts outside a predetermined range, evidence of tampering, or counterfeiting of goods received.* Auditor should verify a written program is in place to address the above-mentioned items. Procedures should indicate follow-up procedures for these issues and documentation maintained of actions taken for these issues.

Ideal: *A written program in place to address the above-mentioned items and documentation maintained of corrective action.*

Fair: *Does not apply to 4.19.*

Weakness: *Written program not in place for one or more of the above-mentioned items. Documentation not maintained of corrective action.*

4.20 *Tamper-resistant/-evident packaging required for received materials, when feasible. (Documented)*

Auditor should verify the facility has evaluated all goods received at facility and types of tamper-resistant/evident packaging on these goods. Efforts should be made to request a type of tamper-resistant/evident packaging on received goods, when feasible. Such packaging could consist of: sealed bags; sealed containers; stretch-wrapped pallets with a security band provided around the stretch-wrap; covered and sealed totes; etc. The presence of this packaging should be verified upon receipt at the facility and documented. A listing should be provided to indicate which goods would have what types of seals. Trained persons should utilize this list at the time of receipt. Tamper-resistant/-evident packaging may not be feasible for all goods received, but the facility should provide a documented assessment to indicate this was evaluated for the various goods.

Ideal: *Plant has documented an assessment of goods received in regards to tamper-resistant/-evident packaging. Tamper-resistant/-evident packaging is verified upon receipt and documented. Tamper-resistant/-evident packaging provided on all goods, when feasible.*

Fair: *Assessment conducted of all goods received and presence of tamper-resistant/-evident packaging verified upon receipt and documented. Tamper-resistant/-evident packaging not provided for all goods when such packaging is feasible.*

Weakness: *Assessment not conducted of all goods. Presence of tamper-resistant/-evident packaging not verified or documented upon receipt.*

EVALUATION CRITERIA

		Rating	Comments
5.0	**Facility Operations**		
5.1	Assessment conducted to indicate sensitive areas, such as materials storage, water supply, steam, compressed air, ice system, air supply, mixing, batching, production, etc. (Documented)		
5.2	Access restricted to authorized individuals in sensitive areas identified in assessment.		
5.3	Water supply and related critical components (storage tanks, backflow preventers, filters, etc.) are secured.		
5.4	Water potability testing conducted on a regular and random basis. (Documented)		
5.5	Water treatment and/or filter systems monitored on a regular basis. (Documented)		
5.6	Formal plan to address and react to a possible water safety issue. (Documented)		
5.7	Air supply systems into facility inspected and/or tested on a regular basis.		
5.8	Appropriate access control, CCTV monitoring, and/or supervision present at key manufacturing or storage locations.		
5.9	Access to bulk ingredient, gas, or chemical storage vessels are controlled to limit unauthorized access to hatches, filters, vents, etc.		
5.10	Physical barriers in place and/or access restricted to hazardous compounds, such as nitrite, cleaning and sanitizing chemicals, maintenance chemicals, pesticides, etc.		

		Rating	Comments
5.0	**Facility Operations (cont'd)**		
5.11	Controls in place to prevent intentional contamination by contractors of maintenance, pest control, or sanitation crews.		
5.12	Program to identify any sampled or opened ingredient containers. Employees aware of program and understand procedures to follow if not properly identified. (Documented)		
5.13	Traceability provided for all ingredients, direct contact packaging and rework. (Documented)		
5.14	Access to food safety manufacturing components limited and controlled (retort controls, pasteurizer controls, heat control components, etc.).		
5.15	Unprocessed goods segregated from processed goods and a program to prevent deliberate mixing of these goods.		
5.16	Food safety detection devices monitored and inspected on a regular frequency to ensure proper function.		
5.17	Tamper-resistant/-evident packaging and/or seals provided for finished goods.		
5.18	All finished goods have appropriate lot identification.		
5.19	Labels held in a secure area.		
5.20	Program to destroy all obsolete or defective labels.		
5.21	Labels provided on containers are verified.		

		Rating	Comments
5.0	**Facility Operations (cont'd)**		
5.22	Equipment design evaluated to minimize possible product tampering.		
5.23	In-house laboratories secured and access restricted to authorized personnel.		
5.24	Positive control cultures of pathogens kept under lock and key.		

EVALUATION GUIDELINES

5.0 FACILITY OPERATIONS

5.1 *Assessment conducted to indicate sensitive areas such as materials storage, water supply, steam, compressed air, ice system, air supply, mixing, batching, production, etc. (Documented)*
Auditor should verify an assessment has been conducted to determine what sensitive areas are present in the facility. The facility should document this assessment and designate these sensitive areas. Efforts should be made to limit access to these sensitive areas by physical or electronic means and/or designating employees authorized in these areas.

Ideal: *Assessment conducted and sensitive areas documented.*

Fair: *Does not apply to 5.1.*

Weakness: *Assessment not conducted or sensitive areas identified.*

5.2 *Access restricted to authorized individuals in sensitive areas identified in assessment.*
Auditor should verify that individuals designated with clearance to the various sensitive areas have been identified. This access should be limited by physical means, electronic access, identification badges, or other suitable means.

Ideal: *Access is restricted to sensitive areas with specific individuals identified as having access to these areas.*

Fair: *One sensitive area without restricted access or without identified individuals.*

Weakness: *Sensitive areas not identified. Unauthorized individuals present in sensitive areas. Access not restricted to sensitive areas by physical means or identification of employees with clearance to these areas.*

5.3 *Water supply and related critical components (storage tanks, backflow preventers, filters, etc.) are secured.*
Auditor should verify water supply and related critical components are secured to limit unauthorized accessibility. Securing these areas can be accomplished by physical means, CCTV surveillance or monitoring cameras, or other appropriate measures.

Ideal: *Water supply and critical components are secured.*

Fair: *Does not apply.*

Weakness: *Any critical components not secured or monitored by appropriate means.*

5.4 *Water potability testing conducted on a regular and random basis. (Documented)*
Auditor should verify a written water testing program. Records should be maintained of this testing. Testing should be conducted as frequently as possible at the facility and on a regular basis, with specific time of sampling varying. For private wells, testing should monitor coliforms, total plate count, yeasts, and molds on a monthly basis. A full EPA

National Primary Drinking Water test shall be conducted once per year. For municipal water users, testing should monitor coliforms, total plate count, yeasts, and molds on a quarterly basis. A copy of the current city water certificate for the full EPA National Primary Drinking Water test shall be maintained on file.

Ideal: *Water testing is conducted on the required frequencies as described above. Tests are documented and are performed randomly.*

Fair: *Does not apply to 5.4.*

Weakness: *Any portions of the required tests not conducted on the described frequencies.*

5.5 *Water treatment and/or filter systems monitored on a regular basis. (Documented)*
Auditor should verify that water treatment and/or filter systems are present on the water supply utilized as an ingredient or on any product contact surfaces. Water treatment may be conducted by a municipality. Filter systems should be 10 microns or smaller, or at a minimum capture possible physical contaminants. All water utilized for product contact, ice or culinary steam should be included in this program.

Ideal: *Water filtration and treatment provided for all water utilized as an ingredient or on product contact surfaces.*

Fair: *Water treatment provided. Filtration not present on water supply system or cannot be verified.*

Weakness: *Water is not treated for ingredients or product contact water.*

5.6 *Formal plan to address and react to a possible water safety issue. (Documented)*
Auditor should verify a formal plan is in place to address any possible water safety issues noted during inspections or facility testing programs. This plan should include corrective action measures for any products produced back to the last acceptable test or previous satisfactory inspection. Any issues noted and corrective action provided should be documented.

Ideal: *Written plan to address potential water safety issues. Log in place to document possible water safety issues and corrective actions/follow-up.*

Fair: *Does not apply to 5.6.*

Weakness: *Written procedures not in place or logs documented to indicate corrective action provided. Products not evaluated back to last successful check in the event of a water safety issue.*

5.7 *Air supply systems into facility inspected and/or tested on a regular basis.*
Auditor should verify a documented program is in place to evaluate and/or test the air supply systems into sensitive product areas. Physical inspections should verify the condition of the air make-up system and filters are in place. Testing should monitor for possible microbiological indicator organisms. Access to air intake points and/or filters should be controlled.

Ideal: *Physical inspections and testing conducted on a regular basis and documented.*

Fair: *Physical inspections conducted and documented. Testing not conducted of air supply system.*

Weakness: *Inspections are not conducted or documented. Filters not present on air supply systems into sensitive areas. Access to air intake points and/or filters is not controlled.*

5.8 *Appropriate access control, CCTV monitoring, and/or supervision present at key manufacturing and storage locations.*
Auditor should verify plant has provided appropriate access control, CCTV monitoring, and/or adequate supervision at key manufacturing and storage areas. Facility should document the program in place to monitor the key areas identified in the facility assessment. The CCTV should be recorded. The recording medium should be retained for a minimum of thirty days. If tapes are utilized, they should be replaced on a regular basis.

Ideal: *Access control, CCTV, and/or supervision present at key areas. The CCTV is recorded. The recording medium is retained for at least thirty days. If tapes are utilized, they are replaced on a regular basis.*

Fair: *Any one key area without appropriate access control, CCTV, and/or adequate supervision.*

Weakness: *More than one key area without appropriate access control, CCTV, and/or adequate supervision. CCTV is not recorded or recording medium is not maintained for at least 30 days.*

5.9 *Access to bulk ingredient, gas, or chemical storage vessels are controlled to limit unauthorized access to hatches, filters, vents, etc.*
Auditor should verify access to all bulk storage vessels are controlled to limit unauthorized access. Securing these accessible areas can be accomplished by locks, seals, restricting access by physical or electronic means, or monitoring these storage vessels with continuous supervision or cameras. Providing locked gates on ladders to access areas on the vessels would also be acceptable. Persons should be designated with access to these vessels.

Ideal: *Access to all openings on bulk storage vessels is secured or properly monitored to limit unauthorized access. Individuals are designated with access to these areas.*

Fair: *Access is secured or monitored. Individuals are not designated with access to these areas.*

Weakness: *Access is not secured or monitored on any accessible openings or hatches to these bulk storage vessels.*

5.10 *Physical barriers in place and/or access restricted to hazardous compounds, such as nitrite, cleaning and sanitizing chemicals, maintenance chemicals, pesticides, etc.*
Auditor should verify hazardous compounds are located in locked areas or access is restricted to these items. Items removed from these secured areas should remain in the control of authorized persons until they are returned to designated storage areas. Food grade lubricants should be kept away from open food manufacturing areas, unless in the control or supervision of a designated individual, e.g. trained maintenance person. Food grade lubricants should not be stored on any equipment. Logs should be maintained to document inventory management of these hazardous compounds and/or chemicals.

Ideal: *No hazardous chemicals stored outside of secured areas, unless in the control of a designated individual.*

Fair: *No hazardous chemicals stored outside of secured areas, unless in the control of a designated individual. Food grade lubricants located in production areas without an acceptable control program. An excessive number of food grade lubricants stored in production areas, not secured.*

Weakness: *Any hazardous chemicals located outside of a secured area or not in the control of a designated individual.*

5.11 Controls in place to prevent intentional contamination by contractors of maintenance, pest control, or sanitation crews.
Auditor should verify a program has been developed to establish food security clearance of contracted individuals or such individuals are continuously monitored while in sensitive areas. Food security clearance should be designated only when contracted individuals have undergone the facility screening program in place for employees.

Ideal: *Program in place to establish food security clearance of contracted individuals or contracted individuals continuously monitored while in sensitive areas.*

Fair: *Does not apply to 5.11.*

Weakness: *Any contracted individuals in sensitive areas without continuous supervision or food security clearance.*

5.12 *Program to identify any sampled or opened ingredient containers. Employees aware of program and understand procedures to follow if not properly identified. (Documented)*
Auditor should verify written procedures are in place to designate how sampled, opened, and repaired containers are identified by facility personnel. Any such containers should be properly closed after repairing, sampling, or opening. These closures should be performed with a seal unique to the facility. This could be done by providing a labeled tape or sticker, unique to the facility. This repair should include the initials of the employee and date of repair. Any ingredient containers identified by employees, without the unique mark, date and employee initials should not be utilized and returned to a designated area until the item can be destroyed. This program should be designed to identify any repairs to ingredient containers conducted by nonfacility personnel, e.g. suppliers.

Ideal: *Program in place and all such repaired containers properly marked. Partial ingredient containers returned to storage areas are properly sealed and identified.*

Fair: *Repaired containers are sealed and employee initials and dates provided, but seal is not unique and identifiable to the facility.*

Weakness: *Any repaired containers not sealed or employee initials and dates provided on the seal. Program not in place.*

5.13 *Traceability provided for all ingredients, direct contact packaging and rework. (Documented)*

Auditor should verify a program is in place to allow traceability of all such items. Lot numbers should be recorded as these goods are utilized. The facility should develop a system to identify bulk materials and create a physical break in the bulk materials as appropriate to the facility. For example, bulk liquid or dry systems should be fully emptied on a frequency appropriate to the facility to allow a physical break between these receipts. This could be accomplished by fully emptying a tank and assigning a new lot number or identification to the next receipt, CIP washes between loads, dry cleaning of dry ingredient systems, etc.

Ideal: *All ingredients, including minor ingredients, direct contact packaging, and rework lot numbers identified. A lot system provided for bulk ingredients with a physical break in the goods, as appropriate to the facility.*

Fair: *All ingredients, including minor ingredients, direct contact packaging, and rework lot numbers identified. A lot system provided for bulk ingredients, but a physical break not provided for the goods, as appropriate to the facility.*

Weakness: *Any ingredients, direct contact packaging, or rework utilized without tracking lot numbers.*

5.14 *Access to food safety manufacturing components limited and controlled (retort controls, pasteurizer controls, heat control components, etc.).*

Auditor should verify access to food safety manufacturing components are limited and controlled to limit unauthorized access or possible manipulation to jeopardize the food safety characteristics of the product. The facility should evaluate all such components, especially those identified as critical in a HACCP program. Securing the systems could be conducted by electronic access control, CCTV equipment and monitoring, or automated devices which do not allow operation of the systems when the food safety characteristic of the product is not met. The facility should document such components identified as critical and the systems in place to secure these.

Ideal: *A documented system in place and adequate securing of these items.*

Fair: *Does not apply to 5.14.*

Weakness: *System is not documented. Adequate controls to secure these components are not in place for any critical components.*

5.15 *Unprocessed goods segregated from processed goods and a program to prevent deliberate mixing of these goods.*
Auditor should verify the facility has a formal system in place to segregate any unprocessed/underprocessed goods that do not meet food safety requirements. This should also include any rejected items from foreign material detection systems such as metal detectors. Segregation of these goods should be done by physical means to limit access to these items or these storage areas adequately monitored.

Ideal: *Unprocessed/underprocessed goods segregated to a secured area.*

Fair: *Does not apply to 5.15.*

Weakness: *Unprocessed/underprocessed goods not segregated to a secured area.*

5.16 *Food safety detection devices monitored and inspected on a regular frequency to ensure proper function.*
Auditor should review a written program, which describes the frequency of monitoring for the food safety detection devices. In regards to food security, the final devices in the system should be evaluated and adequate frequencies established, e.g. final magnet, strainers, filters, metal detectors, etc. The frequency should be determined by the facility and be frequent enough to limit the amount of finished goods produced between checks to a manageable level. The amount of goods produced between checks should be limited to a reasonable amount that can be proper segregated to a secured area in the event of improper function. These frequencies should be indicated in a formal program and the checks conducted by authorized individuals and documented. Procedures should be in place to handle these segregated goods.

Ideal: *Program in place to monitor food safety detection devices at a reasonable frequency. All products segregated to a secured area in the event of nonfunctioning devices. Procedures to handle any segregated goods.*

Fair: *Does not apply to 5.16.*

Weakness: *Program not in place. Suspect goods are not segregated or procedures not in place to handle these goods.*

5.17 *Tamper-resistant/evident packaging and/or seals provided for finished goods.*
Auditor should verify facility provides tamper-resistant/evident packaging and/or seals for finished goods. Effort should be made to provide this for the individual unit, case, and pallet. Some goods produced, such as fresh produce, should be placed in such packaging when feasible. System should be provided to verify proper packaging or seals are present on finished goods. An assessment should be conducted and documented by the facility to determine when such packaging can be utilized.

Ideal: *All individual units packaged in tamper-resistant/-evident packaging and/or seals provided. System in place to verify these measures. An assessment has been conducted and documented by the facility to determine when such packaging can be utilized.*

Fair: *All individual units not provided with appropriate packaging or seals.*

Weakness: *Goods not provided with appropriate packaging or seals, when feasible. System not in place to verify packaging or seals.*

5.18 *All finished goods have appropriate lot identification.*
Auditor should verify all finished goods produced at the facility have adequate lot identification assigned to allow traceability in the event of a recall. This should include bulk finished goods. The lots should be appropriately marked on containers. The lot numbers should be verified and documented.

Ideal: *All goods have lot identification provided, verified, and documented.*

Fair: *All goods have lot identification. Lot identification is not verified or documented.*

Weakness: *Any goods produced without a lot identification to allow specific traceability to those goods.*

5.19 *Labels held in a secure area.*
Auditor should verify all finished product labels are held in a secure area. The facility should provide a secured area for finished product labels to limit unauthorized access to this area. Individuals should be identified with access to these areas. Labels amounts should be accounted for by inventory or other appropriate measures.

Ideal: *Labels held in secure areas, individuals identified with access to these areas, and label amounts accounted for.*

Fair: *Labels held in secure area. Individuals identified. Labels amounts are not verified.*

Weakness: *Labels not held in a secure area. Individuals not identified with access to these areas.*

5.20 *Program to destroy all obsolete or defective labels.*
Auditor should verify program to destroy all obsolete or defective labels. These labels should be appropriately destroyed to limit possible reuse. Disposing of them, without destroying should not be considered acceptable.

Ideal: *Obsolete or defective labels appropriately destroyed.*

Fair: *Does not apply to 5.20.*

Weakness: *Obsolete or defective labels not appropriately destroyed.*

5.21 *Labels provided on containers are verified.*
Auditor should confirm program in place to verify the labels provided on containers. These checks should be documented. This program should monitor for proper labels in regards to product and ingredients. Priority should be given to verification of allergens listed on the labels, which are present in the product to limit possible intentional or

unintentional mislabeling. This should be conducted at a minimum of any product changeovers or replenishing of packaging materials.

Ideal: *Labels are verified on containers and checks documented.*

Fair: *Checks are not documented.*

Weakness: *Labels are not verified on containers.*

5.22 *Equipment design evaluated to minimize possible product tampering.*
Auditor should verify that plant has conducted a formal evaluation of equipment design to minimize possible product tampering. Changes to equipment should be made when feasible. This evaluation and any changes to equipment should be documented.

Ideal: *Plant has a program to evaluate equipment design and changes are made when feasible.*

Fair: *Does not apply to 5.22.*

Weakness: *Program to evaluate equipment design has not been conducted or documented.*

5.23 *In-house laboratories secured and access restricted to authorized personnel.*
Auditor should verify laboratories have been secured to authorized personnel. Securing of these laboratories should be conducted when hazardous materials are present. Securing should be conducted by a method of locking, e.g., electronic access control or a high security keying system. Authorized personnel should be designated.

Ideal: *All laboratories are secured to authorized personnel only.*

Fair: *Does not apply to 5.23.*

Weakness: *Laboratories are not secured. Authorized personnel are not designated.*

5.24 *Positive control cultures of pathogens kept under lock and key.*
Auditor should determine if positive control cultures of pathogens are present at the facility laboratories. These cultures should be kept under lock and key. A procedure shall also be in place to properly restrict access to and destroy inoculated media that has tested positive for pathogens. Authorized personnel to these cultures should be determined.

Ideal: *All positive control cultures are kept under lock and key. Authorized personnel are identified. Procedures in place for handling and destroying inoculated media that has tested positive for pathogens.*

Fair: *Does not apply to 5.24.*

Weakness: *Positive control cultures are not kept under lock and key. Authorized personnel are not designated.*

EVALUATION CRITERIA

		Rating	Comments
6.0	**Finished Goods Storage/Shipping**		
6.1	Finished goods appropriately segregated from raw materials or hazardous chemicals.		
6.2	Quantities of finished goods are tracked and program in place to investigate missing or extra stock.		
6.3	Public storage warehousing and shipping companies utilized by the facility practice food security. (Documented)		
6.4	Written procedures for inspection of all vehicles prior to loading (bulk and nonbulk).		
6.5	Inspection conducted of all outbound vehicles prior to loading. (Documented)		
6.6	Wash certificates and/or seals verified with trailers.		
6.7	Trailer sweepings or other removed materials handled appropriately.		
6.8	Amounts and lot numbers of materials verified during loading.		
6.9	Driver identification verified. (Documented)		
6.10	Security of trucks and trailers maintained during transport to include multiple stops or deliveries.		

EVALUATION GUIDELINES

6.0 FINISHED GOODS STORAGE/SHIPPING

6.1 *Finished goods appropriately segregated from raw materials or hazardous chemicals.*
Auditor should verify that finished goods are appropriately segregated. This segregation must be provided from raw materials when the raw materials create a possible food safety issue. Hazardous materials should not be stored outside of secured areas and in proximity to goods where contamination could occur in the event of spills.

Ideal: *Finished goods appropriately segregated and no concern for contamination is present from hazardous chemicals or raw materials.*

Fair: *Does not apply to 6.1.*

Weakness: *Finished goods not appropriately segregated from hazardous chemicals or raw materials where contamination could occur. Any unsecured hazardous chemicals in finished goods storage areas.*

6.2 *Quantities of finished goods are tracked and program in place to investigate missing or extra stock.*
Auditor should verify that that a program is in place to track quantities of finished goods. Quantities should be tracked in conjunction with the shipping program and documents. Investigation should be provided and documented when unusual missing quantities of goods are noted. Inventories should be taken on a reasonable basis. The facility should determine a reasonable frequency for inventories.

Ideal: *Quantities are tracked and program to investigate missing or extra quantities.*

Fair: *Does not apply to 6.2.*

Weakness: *Any of above criteria not met.*

6.3 *Public storage warehousing and shipping companies utilized by the facility practice food security.*
Auditor should verify that the facility has evaluated all such facilities. These public storage warehousing and shipping companies should be required to verify food security measures while the manufacturer maintains ownership of the goods. These formal programs can be in conjunction with or independent of the manufacturer. These food security measures should be documented and meet applicable food security guidelines as outlined in this document.

Note: The auditor should review a document that indicates these programs are in place at such facilities or shipping companies.

Ideal: *Documentation provided that indicates food security programs are in place for public storage warehousing or shipping companies utilized by the facility.*

Fair: *Does not apply to 6.3.*

Weakness: *Documentation not provided of these food security programs for any applicable warehouses or shipping companies.*

6.4 *Written procedures for inspection of all vehicles prior to loading (bulk and nonbulk).*
Auditor should verify written procedures are in place to cover inspection of all carriers prior to loading. These inspections should include criteria to ensure food safety or food security of the carrier has not been jeopardized prior to loading.

Ideal: *Procedures in place for all bulk and non-bulk carriers prior to loading.*

Fair: *Does not apply to 6.4*

Weakness: *Procedures not in place for bulk or nonbulk carriers.*

6.5 *Inspections conducted of all outbound vehicles prior to loading.*
Auditor should verify that inspections are conducted of all outbound vehicles prior to loading. These inspections should be documented by the facility.

Ideal: *Inspections conducted of all outbound vehicles prior to loading.*

Fair: *Does not apply to 6.5.*

Weakness: *Any outbound vehicles loaded without inspections conducted. Inspections not documented.*

6.6 *Wash certificates and/or seals verified with trailers.*
Auditor should verify that that a policy exists to verify all wash certificates and/or seals on bulk trailers or vehicles prior to loading. Wash or cleaning certificates should be provided for all bulk vehicles. This certificate should be verified by the facility, indicate the vehicle/trailer identification, amount of seals, seal numbers, agency conducting trailer wash/cleaning.

Ideal: *All bulk vehicles have a wash/cleaning certificate with required information. These certificates are verified and kept on file at the facility for review.*

Fair: *Does not apply to 6.6.*

Weakness: *Wash/cleaning certificates not provided. Vehicles loaded without verification of certificates. Certificates not retained on file for review.*

6.7 *Trailer sweepings or other removed materials handled appropriately.*
Auditor should verify a program is in place to handle such materials appropriately. Designated and separate equipment should be utilized for trailer cleaning. It would be recommended that trailer sweepings or other materials not be brought into and disposed of within the facility. The sweepings should be disposed of outside the facility.

Ideal: *Designated and separate equipment utilized for trailer cleaning. Sweepings not brought into the facility and disposed of outside the facility.*

Fair: *Sweepings disposed in covered trash containers within the facility.*

Weakness: *Designated and separate equipment not utilized for trailer cleaning. Sweepings not properly disposed in the facility. Trailers loaded with evidence of sweepings or possible contaminants in the trailer.*

6.8 *Amounts and lot numbers of materials verified during loading.*
Auditor should review a written program utilized by the facility to verify the product(s), amounts, labels, lot numbers, etc. are checked against shipping records. The shipping records should list the above-mentioned criteria to allow this review. A copy of the shipping records should be maintained on file to allow traceability in the event of a recall. Written procedures should be in place to address any irregularities determined during this verification. Documentation should also be maintained to indicate these items have been verified at the time of loading.

Ideal: *Written procedures available for verification and irregularities. Product(s), amount, labels, lot numbers, etc. are verified at the time of loading against the shipping records and these checks documented.*

Fair: *Product(s), amount, labels, lot numbers, etc. are verified and documented at the time of shipping against the shipping records. Written procedures not available to describe the verification and handling of irregularities.*

Weakness: *Program not in place to verify the criteria or checks are not documented.*

6.9 *Driver identification verified. (Documented)*
Auditor should verify that procedures exist to verify the truck and driver identification at the facility. The driver should provide government issued photo identification and this matched to documents provided by the supplier vehicle prior to the trailer being spotted at the dock.

Ideal: *Positive identification made of the truck and driver prior to spotting the trailer at the dock.*

Fair: *Positive identification made of the truck and driver after spotting the trailer at the dock.*

Weakness: *Positive identification of the truck and driver not made prior to loading. No formal procedures exist to identify the truck or driver.*

6.10 *Security of trucks and trailers maintained during transport to include multiple stops or deliveries.*
Auditor should verify a formal program is in place to maintain the security of these vehicles. These vehicles should be secured after loading is completed at the facility. Seal numbers should be documented on the shipping documents. Security of the trucks/ trailers must be maintained for vehicles making multiple stops or deliveries. The facility should document a formal procedure to indicate how this will be accomplished. This

could be done be resealing the trailer after each stop, driver responsibility for maintaining a secured trailer at multiple stops, or locking the vehicle. Vehicles should be resealed or locked when they are not monitored by the driver on multiple stops. The drivers of these multiple stop vehicles should be adequately trained per the company policy.

Note: This should include Less-Than-Load (LTL) shipments.)

Ideal: *Security of trucks is maintained after loading to include multiple stops. Seal numbers are documented. Written procedure in place to describe how security will be maintained at multiple stops. Drivers are properly trained per company policy on multiple stops.*

Fair: *Does not apply to 6.10.*

Weakness: *Any criteria not met in the "Ideal" section.*