

Warehouse and Distribution Center Food Safety, Sanitation and Quality Audit

Company Information	Audit Information
<p>Facility: C0052656 - Keele Warehousing & Logistics</p> <p>Address: 90 Summerlea Road Brampton , Ontario Canada, L6T 4X3</p> <p>Contact: Mr. James Appelbe</p> <p>Title: President</p> <p>Phone: 416-244-8200 X222</p> <p>Fax: 416-244-8201</p> <p>Email: james@keelewarehousing.com</p>	<p>Audit# - Visit#: 1087740 - 818659</p> <p>Audit Type: DC - Warehouse and Distribution Center Food Safety, Sanitation and Quality Audit</p> <p>Template Version: 1.9</p> <p>Audit Category: REGULAR</p> <p>Auditor: Joe Korpan</p> <p>Audit Start Time: 07-OCT-2015 08:30:00 AM</p> <p>Audit End Time: 07-OCT-2015 04:00:00 PM</p> <p>Prior Audit Date: 05-JUN-14</p>

Explanation of Section Scorings (below)

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

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

Summary By Section				
Section Name	Non-Conformance	Major Non-Conformance	Critical	Score
Section A - Administration and Regulatory Compliance	2	0	0	90.00%
Section B - HACCP Management	0	0	0	100.00%
Section C - Facilities and Equipment	0	0	0	100.00%
Section D - Sanitation, Housekeeping and Hygiene	1	0	0	95.00%
Section E - Rodent and Pest Control Management	0	0	0	100.00%
Section F - Approved Suppliers, Receiving and Inventory Control	0	0	0	100.00%
Section G - Process and Product Evaluation	0	0	0	100.00%
Section H - Packaging and Labeling	0	0	0	100.00%
Section I - Storage and Shipping	0	0	0	100.00%
Section J - Training Requirements	0	0	0	100.00%
Section K - Food Defense	0	0	0	100.00%

Explanation of Overall Audit Result (below)

The overall score result is based on the total number and level of non-conformances. The audit is allocated 100% and deductions made as follows:

- Non-Conformance = 1% deduction per finding off the total score
- Major Non-conformance = 10% deduction per finding off the total score
- Critical Non-conformance = 25% deduction per finding off the total score

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

Overall Audit Result	
Grade Rule Result	% Score
Meets Expectations	97.00%

Present at Audit					
Name	Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Maricel Estrada	CSR / Office Administration / Safety	Yes	No	Yes	Yes
James Appelbe	Company President	Yes	Yes	Yes	Yes

GENERAL INFORMATION	
No	Question/Notes
1.1	<p>Facility and Operations Description.</p> <p>Auditor's Notes: This is an announced audit. This is a 100,000 sq ft warehousing operation located at 90 Summerlea Road, Brampton, Ontario. They receive and store product for clients in North America. There is no refrigerated or freezer storage. All product is stored at ambient temperatures. At customer request, they would ship the stored product to client customer locations in Canada or USA. They do not own any trucks, so all trucking is through various common carriers or customers own trucks. The majority of products stored are food items. All products stored are stored by customer. Aisles are dedicated for specific customers and in some cases, employees are dedicated to those customers.</p>
1.2	<p>Regulatory Inspection Type and Establishment #:</p> <p>none The facility is not registered with any regulatory body. No regulatory inspections have taken place.</p>
1.3	<p>Products warehoused/produced at this facility.</p> <p>No production or , canned food products (fruits / veg), canned fish & seafood, raw food ingredients No production or processing occurs. Products are received, tagged, stored, and then shipped at customer direction. Products handled include canned fruits and vegetables, canned fish and seafood, raw food ingredients, cleaning and sanitizing supplies, and pharmaceuticals (started approximately 2 weeks prior to audit).</p>
1.4	<p>The following departments and individuals participated in the audit process:</p> <p>pres and office admin James Appelbe (Company President) and Maricella Estrada (CSR / Food Safety) both participated.</p>
1.5	<p>Notes from Auditor</p> <p>. The facility is very clean and well organized. Employees are well trained as determined through questioning and observation. Non-conformances from the previous audit have been satisfactorily corrected. The President and CSR involved during the audit were very cooperative. Discussion and questioning during the day indicates that management is very committed to food safety and best practices for warehousing and distribution. In rare cases when received products are damaged, some repacking into boxes does occur. Affected and unsaleable product is disposed of . The customer provides extra boxes for this purpose. The President is considering expanding the food safety program and examining GFSI standards as the next step.</p>

Non-Compliance Summary		
No	Question/Notes	Result
Section A/A.6	<p>Document and Records Management</p> <p><i>GMP-08/01 Control of Documents details the Document Control protocol. The President in consultation with a management representative is responsible for controlling documents and making them available to staff as needed. The President is responsible for document approval. Numerous Policy documents and work instructions are available in the Quality Manual and are available to staff. Some are posted for quick reference. All documents are maintained for at least three years. Discussion indicates that all documents are kept for 7 years. Records are maintained on file for 6 years. Many records are maintained electronically for inventory control. Training, cleaning and maintenance, and internal audit records are paper copy.</i></p> <p><i>Minor - The "Periodic Sanitation & Maintenance Checklist" is used to record cleaning and maintenance indicates frequency with a basic procedure for cleaning various areas of the facility. It indicates monthly for a Floor Drain check, but there is no record of monthly checks for all of 2015. These records were also not verified monthly as indicated at the bottom each page.</i></p>	Non-Conformance*

Section A/A.9	<p>Crisis and Natural Disaster Management <i>GMP - 06/04 Continuity of Operations / Crisis Response Program includes the Food Defense Program (GMP-06/01). A risk assessment was also done in regards to food defense. Potential threats to the operation were assessed and documented as to likelihood. The Food Safety & Quality Management Team" is the Crisis Response Team. The team includes the President, Controller, Warehouse Supervisor and any other chosen employee. Training of team is reviewed annually - Sept. 11, 2015 session is documented.</i></p> <p><i>Minor - Not all team members were included in the training - Controller is indicated as a team member but is not recorded as having been trained..</i></p>	Non-Conformance*
Section D/D.7	<p>Personal Hygiene and Good Manufacturing Practices <i>A number of the required hygiene requirements are included throughout the policy documents and are considered adequate for this operation.</i></p> <p><i>Minor - There is no policy on illness or communicable diseases.</i></p>	Non-Conformance*

Section A. Administration and Regulatory Compliance		
No	Question/Notes	Result
A.1	<p>Organization and Responsibilities</p> <p><i>An Organizational chart is documented showing reporting structure of the operation. An "Allocation of Responsibilities" (Appendix D) is documented which indicates the position and program they are responsible for. Responsibilities are also interspersed within the Work Instruction manual and specifically GMP-WI-01 (Customer Service and Shipping Office Duties). A Food Safety & Quality Management Team, and Recall Team are documented which provide general responsibility for team members.</i></p>	Acceptable
A.2	<p>Policies and Procedures Manual</p> <p><i>Numerous manuals are documented. This includes the Quality Management Manual, Work Instructions, and HACCP Manual.</i></p>	Acceptable
A.3	<p>Management Awareness and Commitment</p> <p><i>President is the owner and has been in business for over 20 years. Discussion and questioning indicates that the President is very aware of the program and involved. He walks the floor daily.</i></p>	Acceptable
A.4	<p>Product Identification, Traceability and Recall Plans and Procedures</p> <p><i>All product handled is received in packed form from manufacturers / suppliers and at receiving, each skid is tagged with customer code and received date. All data is input into the inventory system with the bin # location. A Traceability and Mock Recall Program is documented which details how product is identified at receiving and in house. A Recall Manual is also available detailing the recall process and notifications.</i></p>	Acceptable
A.5	<p>Regulatory Compliance</p> <p><i>No CFIA or FDA registration or visits. Health Canada has recently visited in regards to pharmaceutical storage, but there was no inspection report. All pharmaceuticals must be Quarantined until the approved individual (from McCarthy Consultants) by Health Canada releases.</i></p>	N/A
A.6	<p>Document and Records Management</p> <p><i>GMP-08/01 Control of Documents details the Document Control protocol. The President in consultation with a management representative is responsible for controlling documents and making them available to staff as needed. The President is responsible for document approval. Numerous Policy documents and work instructions are available in the Quality Manual and are available to staff. Some are posted for quick reference. All documents are maintained for at least three years. Discussion indicates that all documents are kept for 7 years. Records are maintained on file for 6 years. Many records are maintained electronically for inventory control. Training, cleaning and maintenance, and internal audit records are paper copy.</i></p> <p><i>Minor - The "Periodic Sanitation & Maintenance Checklist" is used to record cleaning and maintenance indicates frequency with a basic procedure for cleaning various areas of the facility. It indicates monthly for a Floor Drain check, but there is no record of monthly checks for all of 2015. These records were also not verified monthly as indicated at the bottom each page.</i></p>	Non-Conformance*
A.7	<p>Change Management</p> <p><i>The Document Control Master List is used to record changes. Observed. Documents are maintained for at least 3 years. Records are stored for 6 years. The Document Control Master List was reviewed during the audit and was revised Oct. 6, 2015.</i></p>	Acceptable
A.8	<p>Documentation to Track Effectiveness of Policies</p> <p><i>A "Food & Product Safety and Quality Meeting Report" is created after the annual meeting which is for a review of the whole program. Latest meeting was Oct. 2, 2015. Meeting records trends of incidents, Corrective Action - Protective Action Report (CPAR) summary, and any outstanding issues from previous meeting.</i></p>	Acceptable
A.9	<p>Crisis and Natural Disaster Management</p> <p><i>GMP - 06/04 Continuity of Operations / Crisis Response Program includes the Food Defense Program (GMP-06/01). A risk assessment was also done in regards to food defense. Potential threats to the operation were assessed and documented as to likelihood. The Food Safety & Quality Management Team" is the Crisis Response Team. The team includes the President, Controller, Warehouse Supervisor and any other chosen employee. Training of team is reviewed annually - Sept. 11, 2015 session is documented.</i></p> <p><i>Minor - Not all team members were included in the training - Controller is indicated as a team member but is not recorded as having been trained..</i></p>	Non-Conformance*
A.10	<p>Customer/Consumer Complaints (Policies, Follow Up and Response)</p> <p><i>The customer complaint program is included in the CA-PA procedure (GMP-11/01). A Customer Communications & Feedback policy / procedure (GMP 12/01) includes handling of customer complaints. Complaints are recorded on the CPAR (Part A) by any employee in the department</i></p>	Acceptable

Section A. Administration and Regulatory Compliance		
No	Question/Notes	Result
	<i>and passed on to management for followup. A review of the complaints log was done during the audit.</i>	

Section B. HACCP Management		
No	Question/Notes	Result
B.1	Preliminary HACCP Tasks <i>The Food Safety & Quality Management Team is the HACCP team. Roles are spelled out in the Responsibilities document. Process flow is simple and detailed. There are no CCPs. The whole HACCP Plan was reviewed on Sept.30, 2015 at the Food Safety Meeting.</i>	Acceptable
B.2	Hazard Analysis (HACCP Principle 1) <i>A hazard analysis has been conducted including various product types and process steps.</i>	Acceptable
B.3	Critical Control Points (HACCP Principle 2) <i>There are no CCPs.</i>	N/A
B.4	Critical Limits (HACCP Principle 3) <i>There are no CCPs.</i>	N/A
B.5	CCP Monitoring (HACCP Principle 4) <i>There are no CCPs.</i>	N/A
B.6	Corrective Actions (HACCP Principle 5) <i>There are no CCPs.</i>	N/A
B.7	Verification and Validation (HACCP Principle 6) <i>Although the process is very simple in regards to receiving, storage and shipping the products, an adequate hazard analysis was conducted. Since there are no CCPs, there is no verification or validation required for CCPs. The HACCP Plan was verified during the annual review.</i>	Acceptable
B.8	Documentation and Record Keeping (HACCP Principle 7) <i>No CCP records are required. All records used in the process are appropriately completed and verified.</i>	Acceptable

Section C. Facilities and Equipment		
No	Question/Notes	Result
C.1	Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management <i>Water is provided by the municipality. No water is used on product. Water is only used for hand washing, washrooms, and cleaning of floors, etc. Backflow preventors are in place.</i>	Acceptable
C.2	Facility Construction and Design <i>The facility was previously used as a warehouse and included a large cooler. The cooler room remains as part of the operation but is not in use. Observed.</i>	Acceptable
C.3	Facility Condition (Walls, Ceilings, Floors, etc.) <i>Floors are poured concrete and in good condition. Walls and ceilings are acceptable for the type of operation.</i>	Acceptable
C.4	Employee Facilities <i>A locker / change room is provided. The lunchroom is provided with tables and chairs, refrigerator, 4 microwave ovens, shelving for lunch containers. The mens washroom contains 2 toilets and a urinal and contains all required supplies. No women work in the warehouse. Female employees use the washroom in the office area. All employee areas are well lit and ventilated. Employee areas are included in the cleaning and sanitation schedule.</i>	Acceptable
C.5	Handwashing Facilities <i>Hand wash stations are provided and adequate in number. Hand wash signs are posted and hot water is provided within a few seconds. Observed.</i>	Acceptable
C.6	Equipment Layout, Design and Conditions <i>Only forklifts and steel racking are available. All are in very good condition.</i>	Acceptable
C.7	Plant Lighting and Protection <i>All lights are recessed into or near the ceiling. They are protected. No damaged fixtures were observed. Lighting appears to be adequate for all functions.</i>	Acceptable
C.8	Maintenance Standard (Support of GMPs, Housekeeping, Lubricants) <i>No processing occurs. The facility is clean and well maintained. All items are stored in an orderly fashion and location is identified in the inventory system.</i>	Acceptable

Section D. Sanitation, Housekeeping and Hygiene		
No	Question/Notes	Result
D.1	Master Sanitation Schedule and Monitoring <i>A Master Sanitation Schedule is documented and included in the Safety & Sanitation manual. A "Periodic Sanitation & Maintenance Checklist" is used to record weekly, monthly, semi-annual and annual cleaning.</i>	Acceptable
D.2	Standard Sanitation Operating Procedures and Monitoring <i>The Cleaning & Sanitation Program (GMP 03/01) is documented and outlines the requirements. Basic procedures are also documented on the "Periodic Sanitation & Maintenance Checklist". Work Instructions are also available.</i>	Acceptable
D.3	Cleaning Chemical and Sanitizer Control <i>The type of operation does not require any major use of cleaning chemicals. Cleaning supplies are used in the washrooms and lunchroom. Cleaning supplies are stored in a designated area. A mobile floor scrubber is used on all open floor areas and uses only hot water.</i>	Acceptable
D.4	Pre Operational Monitoring and Corrective Action <i>Company President daily does a visual examination of the whole facility. The "Periodic Sanitation & Maintenance Checklist" is also used to indicate visual verification of the cleaning.</i>	Acceptable
D.5	Verification of Cleaning Effectiveness <i>No processing occurs, or equipment onsite for any processing. Only packed products are received, stored and shipped. Visual inspection is performed after each scheduled cleaning. Cleaning is recorded on the "Periodic Sanitation & Maintenance Checklist".</i>	N/A
D.6	Operational Housekeeping and Monitoring <i>No processing occurs and there is no exposed product. The "Periodic Sanitation & Maintenance Checklist" includes removing garbage, mopping floors in the staging area and by the dock doors, mopping with a household detergent in various walkways. The record also includes visual verification of all areas of the facility. Examination of the whole facility during the audit shows it is well maintained and very clean. No debris was observed in any area of the facility.</i>	Acceptable
D.7	Personal Hygiene and Good Manufacturing Practices <i>A number of the required hygiene requirements are included throughout the policy documents and are considered adequate for this operation.</i> <i>Minor - There is no policy on illness or communicable diseases.</i>	Non-Conformance*
D.8	Internal Audits and Corrective Actions <i>An Internal Audit of the operation was conducted on August 26, 2015. A few deficiencies were noted with appropriate corrective action. Internal audits are to be done annually.</i>	Acceptable

Section E. Rodent and Pest Control Management		
No	Question/Notes	Result
E.1	Documented and Specific Pest Control Program <i>The Pest Control Program (GMP 04/01) is documented and provides an overview of the program. The contracted PCO also provides a binder which includes a map of device locations, pesticide usage log, MSDS for pesticides, reports for each inspection, all required licenses and insurance documents.</i>	Acceptable
E.2	Outside Premises Management (Grounds, Waste Disposal Areas) <i>The exterior of the property is well maintained with no debris anywhere or materials piled or stored. All traffic areas are paved. Exterior bait stations are used and inspected by the contracted PCO.</i>	Acceptable
E.3	Inside Premises Management <i>No spills were observed. The interior of the facility is in good condition, with no openings or holes observed in the outside walls. Adequate number of traps are available and located properly. India Meal Moth traps (IMM) and bug lights are in place on the interior. All are monitored regularly by the contracted PCO. The facility staff also monitors interior traps regularly.</i>	Acceptable
E.4	Pest Tight Doors and Entrance Closures <i>All doors have good seals. No issues observed.</i>	Acceptable
E.5	Secure Storage and Documentation of Pest Related Chemicals <i>No poison bait is used on the interior. All poison bait and potential chemicals for IMM and other insects are controlled and handled by the PCO. None are stored on site.</i>	Acceptable
E.6	Detailed Activity Reports with Corrective Actions <i>Reports are provided for each inspection. Observed.</i>	Acceptable

Section F. Approved Suppliers, Receiving and Inventory Control		
No	Question/Notes	Result
F.1	Supplier Approval Policies and Procedures <i>The facility does not purchase or own any products. All supplier approval requirements are managed by the customer's own program. If necessary, the company can obtain supplier information from the customers.</i>	N/A
F.2	Incoming Vehicle Inspection and Documentation <i>The "Receiving & Shipping Requirements" (GMP 02/01) covers truck inspections. Inspections are recorded on the "Inbound Receiving Form", and "Bill of Lading" for outbound loads. Inspections include vehicle condition and identification. There is no temperature requirement other than to keep from freezing in winter for some products.</i>	Acceptable
F.3	Release Criteria for Ingredients <i>All accepted products are input into the inventory system with storage location provided by the forklift driver. No processing occurs. Product in storage is only released at customer direction. Once the order is received, the appropriate products are picked and palletized, then staged for shipping. A second employee then verifies the order before signing off that it meets the customer requirements.</i>	Acceptable
F.4	Storage and Handling Policies and Practices <i>Storage areas are not refrigerated. No refrigerated products are handled. All product storage and handling areas are clean, well maintained and free of debris or refuse. Examination beneath dock levelers and dock plates shows good housekeeping in those areas as well.</i>	Acceptable
F.5	Bulk Receiving Systems Sanitation and Monitoring <i>No bulk materials are handled.</i>	N/A
F.6	Restricted and/or Sensitive Ingredient Control, Including Chemical Compounds <i>materials are stored in designated areas. All non-food products are stored on one side of the warehouse which is separated by a makeshift wall. Within this area, hazardous materials are stored in designated aisles. Food products are stored on the other side of the warehouse in designated. In many areas of the facility, whole aisles and associated racking is dedicated to product types or specific customers.</i>	Acceptable

Section G. Process and Product Evaluation		
No	Question/Notes	Result
G.1	Process Control and Documentation Procedures <i>No processing occurs. Products in storage are received already packed and boxed from the supplier / manufacturer.</i>	Acceptable
G.2	Specification and Formulation Control and Accuracy <i>No specification or formulation control is required. No products are produced.</i>	N/A
G.3	Routine Calibration of Operational Equipment and Measuring Devices <i>No equipment requires calibration.</i>	N/A
G.4	Foreign Material Control <i>No foreign material control devices or program is required. A visual examination of the received pallet condition is done.</i>	N/A
G.5	Application of Statistical Control <i>No statistical control is required. No products are produced.</i>	N/A
G.6	Allergen and Sensitive Ingredient Controls <i>Allergens are tagged with a large yellow sticker on receipt. No exposed allergens are handled. All incoming product is already packaged. An Allergen Control Program (GMP 05/01) is documented and implemented.</i>	Acceptable
G.7	Specification Compliance Documentation <i>No specification compliance is required. No products are produced. All specifications are the responsibility of the manufacturer / customer. Work Instructions are available which detail each customers specific specifications / requirements.</i>	N/A
G.8	Rework and Carryover Products <i>No rework occurs. No products are produced.</i>	N/A
G.9	Analytical Records Management <i>Analytical records are not required.</i>	N/A

Section H. Packaging and Labeling		
No	Question/Notes	Result
H.1	Label Accuracy and Regulatory Compliance <i>No labeling occurs. No products are produced.</i>	N/A
H.2	Documented Net Weight or Count Compliance Policy and Performance <i>No products are produced. No net weight or count compliance is required.</i>	N/A
H.3	Clear Manufacturing Codes on Individual and Cased Product	N/A

Section H. Packaging and Labeling		
No	Question/Notes	Result
	<i>All products do contact accurate and clear codes, but these are the responsibility of the manufacturer / customer.</i>	
H.4	Package Integrity and Function <i>No package integrity or function activity is required,. No products are produced. Receivers inspect all incoming products for damage and packaging integrity. Policy requires damaged product to be disposed of and supplier notified.</i>	Acceptable
H.5	Label Security and Obsolete Label Controls <i>No labeling is done. No product labels are stored.</i>	N/A

Section I. Storage and Shipping		
No	Question/Notes	Result
I.1	Warehouse and Finished Product Management <i>All incoming products are tagged with received date. All pharmaceuticals are tagged with a red "Quarantined" tag and are not to be removed from quarantine without approval / release by a specific individual approved by the customer. Product on "Hold" are also tagged with a red "Hold" tag. The inventory system prevents picking of these products as they are identified in the system by status. Checked system with product on Hold in bin B69.</i>	Acceptable
I.2	Retained and Returned Products <i>Retained and returned product (rare) are adequately managed. They are identified in the inventory system as well as in storage.</i>	Acceptable
I.3	Storage Facility and Dock Maintenance <i>Dock area and staging areas are clean and well maintained.</i>	Acceptable
I.4	Transport Condition <i>A Trailer / Container Inspection document is posted by the dock doors for reference by the receivers / shippers. It details what must be checked on each incoming and outgoing vehicle. All outgoing vehicles are inspected and inspection is recorded.</i>	Acceptable
I.5	Release Authorization to Ship Product <i>A procedure is documented. Discussion and questioning of President and employees indicates that the picker obtains products as ordered by the customer for shipping to their customer. Another shipping employee then inspects the palletized products to verify the order was picked correctly. Then the order is signed off by both the picker and verifier to release the order.</i>	Acceptable

Section J. Training Requirements		
No	Question/Notes	Result
J.1	New Hire Training <i>All new hires are trained on all aspects of food safety, hygiene / GMPs, etc., plus job specific duties. An Employee Handbook is also provided which contains company policies. Records are maintained, and observed during the audit.</i>	Acceptable
J.2	Training Language <i>All training has been in English. All employees speak English.</i>	Acceptable
J.3	Prerequisite Program Training <i>All employees receive training in facility maintenance (cleaning and sanitation). Records are available. .</i>	Acceptable
J.4	Refresher Training <i>Refresher training occurs annually as per each calendar year.</i>	Acceptable
J.5	Proof of Knowledge <i>Each employee is given a short quiz to verify training. Questioning of a few employees on food safety / hygiene requirements shows they are well trained and knowledgeable.</i>	Acceptable
J.6	Training Records <i>Records are available. Observed during audit.</i>	Acceptable
J.7	Training Program Review <i>The training program is included in the annual review.</i>	Acceptable

Section K. Food Defense		
No	Question/Notes	Result
K.1	Management <i>A Food Defense Program (GMP 06/01) is documented. A Food Defense & Vulnerability Assessment was initially done in March 2014 when they moved to this location. It was based on the AIB Food Defense Guidelines (2010). It is a detailed checklist covering all potential areas.</i>	Acceptable
K.2	Human Element <i>The President does hiring and knows all employees. All visitors must be allowed into the facility</i>	Acceptable

Section K. Food Defense		
No	Question/Notes	Result
	<i>(coded entry door) and must sign in if entering past the office. They must also be accompanied. Truck drivers are also directed to specific dock doors and have a dedicated entry and sign in.</i>	
K.3	Facility <i>The property is completely fenced and gated. A Continuity of Operations / Crisis Response Plan is documented (GMP 06/04) which provides a brief overview of responding to a crisis. An additional document (GMP 06/03) outlines the Opening, Patrolling, and Closing Procedures to be implemented each day.</i>	Acceptable
K.4	Operations <i>A Food Defense & Vulnerability Assessment was initially done in March 2014 when they moved to this location. It was based on the AIB Food Defense Guidelines (2010). It is a detailed checklist covering all potential areas to assess vulnerability.</i>	Acceptable

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