NSF International

Warehouse and Distribution Center Food Safety, Sanitation and Quality Audit

Company Information		Audit Information	
Facility:	C0052656 - Keele Warehousing & Logistics	**Audit# - Visit#:**	1500158 - 1168985
Address:	90 Summerlea Road Brampton , Ontario Canada, L6T 4X3	**Audit Type:**	DC - Warehouse and Distribution Center Food Safety, Sanitation and Quality Audit
		Template Version:	1.9
Contact:	Mr. James Appelbe	**Audit Category:**	REGULAR
Title:	President	**Auditor:**	Tom Boettger
Phone:	416-244-8200 X222	**Audit Start Time:**	17-NOV-2016 07:55:00 AM
Fax:	416-244-8201	**Audit End Time:**	17-NOV-2016 04:00:00 PM
Email:	james@keelewarehousing.com	**Prior Audit Date:**	07-OCT-15

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	1	0	0	95.00%
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	0	0	0	100.00%
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	1	0	0	95.00%
Section J - Training Requirements	1	0	0	95.00%
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**
Chris Kalenik	Warehouse Supervisor	No	Yes	No	Yes
James Appelbe	President	Yes	Yes	Yes	Yes
Maricel Ballore - Estrella	Customer Service Rep	No	No	Yes	Yes

GENERAL INFORMATION	
No	**Question/Notes**
1.1	**Facility and Operations Description.** Auditor's Notes: This is an announced audit. Keele Warehousing 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. 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.
1.2	**Regulatory Inspection Type and Establishment #:** The facility is not subject to any regulatory inspection or registration requirement.
1.3	**Products warehoused/produced at this facility.** The facility is divided into 2 areas. One area is dedicated to food storage (canned food products (fruits / veg), canned fish & seafood, raw food ingredients). under ambient conditions. The second area is dedicated to non-food items (sanitation chemicals, construction products and mining product). No processing is done in this facility.
1.4	**The following departments and individuals participated in the audit process:** James Appelbe (Company President), Chris Kalenik (Warehouse Supervisor) and Maricel Ballore - Estrella (CSR / Food Safety) participated.
1.5	**Notes from Auditor** The facility is very clean and well organized. Employees are well trained as determined through questioning and observation. Nonconformances 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.

Non-Compliance Summary		
No	**Question/Notes**	**Result**
Section A/A.10	**Customer/Consumer Complaints (Policies, Follow Up and Response)** ***The facility receives very few customer complaints. Customer complaint handling is mentioned as a part of the recall procedure, and requires prompt follow up and response. Deviation: A consumer complaint procedure, and the associated investigation and record keeping is not clearly documented. Reference to CPAR procedure and associated records is not made.***	Non-Conformance*
Section I/I.2	**Retained and Returned Products** ***Facility has documented procedures for receiving, shipping, recall and damaged products. Procedures mention identification of product through red tags.*** ***Deviation: No clear hold procedure, for control of product with the facility is documented.***	Non-Conformance*
Section J/J.5	**Proof of Knowledge** ***The facility training records include training session contents, date, time, and proof of knowledge confirmation.*** ***Deviation: The proof of knowledge confirmation is initialed by the trainer, but no supporting records were available for review.***	Non-Conformance*

Section A. Administration and Regulatory Compliance		
No	**Question/Notes**	**Result**
A.1	**Organization and Responsibilities** ***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.***	Acceptable
A.2	**Policies and Procedures Manual** ***Numerous manuals are documented. This includes the Quality Management Manual, Work Instructions, and HACCP Manual.***	Acceptable
A.3	**Management Awareness and Commitment** ***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.***	Acceptable
A.4	**Product Identification, Traceability and Recall Plans and Procedures** ***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.***	Acceptable
A.5	**Regulatory Compliance** ***No CFIA or FDA registration or visits.***	Acceptable
A.6	**Document and Records Management** ***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.***	Acceptable
A.7	**Change Management** ***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.***	Acceptable
A.8	**Documentation to Track Effectiveness of Policies** ***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 November 15, 2016. Meeting records trends of*** ***incidents, Corrective Action - Protective Action Report (CPAR) summary, and any outstanding issues from previous meeting.***	Acceptable
A.9	**Crisis and Natural Disaster Management** ***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.***	Acceptable
A.10	**Customer/Consumer Complaints (Policies, Follow Up and Response)** ***The facility receives very few customer complaints. Customer complaint handling is mentioned as a part of the recall procedure, and requires prompt follow up and response.*** ***Deviation: A consumer complaint procedure, and the associated investigation and record keeping is not clearly documented. Reference to CPAR procedure and associated records is not made.***	Non-Conformance*

Section B. HACCP Management		
No	**Question/Notes**	**Result**
B.1	**Preliminary HACCP Tasks** ***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 November 15, 2016 at the Food Safety Meeting.***	Acceptable
B.2	**Hazard Analysis (HACCP Principle 1)**	Acceptable

Section B. HACCP Management		
No	**Question/Notes**	**Result**
	A hazard analysis has been conducted including various product types and process steps.	
B.3	**Critical Control Points (HACCP Principle 2)** ***There are no CCPs.***	N/A
B.4	**Critical Limits (HACCP Principle 3)** ***There are no CCPs.***	N/A
B.5	**CCP Monitoring (HACCP Principle 4)** ***There are no CCPs.***	N/A
B.6	**Corrective Actions (HACCP Principle 5)** ***There are no CCPs.***	N/A
B.7	**Verification and Validation (HACCP Principle 6)** ***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.***	Acceptable
B.8	**Documentation and Record Keeping (HACCP Principle 7)** ***No CCP records are required. All records used in the process are appropriately completed and verified.***	Acceptable

Section C. Facilities and Equipment		
No	**Question/Notes**	**Result**
C.1	**Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management** ***Water is provided by the municipality, and annual reports are maintained on file.. No water is used on product. Water is only used for hand washing, washrooms, and cleaning of floors, etc. Backflow preventors are in place.***	Acceptable
C.2	**Facility Construction and Design** ***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 as refrigerated storage. All useable space is dedicated to ambient storage.***	Acceptable
C.3	**Facility Condition (Walls, Ceilings, Floors, etc.)** ***Floors are poured concrete and in good condition. Walls and ceilings are acceptable for the type of operation.***	Acceptable
C.4	**Employee Facilities** ***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.***	Acceptable
C.5	**Handwashing Facilities** ***Hand wash stations are provided and adequate in number. Hand wash signs are posted and hot water is provided within a few seconds.***	Acceptable
C.6	**Equipment Layout, Design and Conditions** ***Only forklifts and steel racking are available. All are in very good condition.***	Acceptable
C.7	**Plant Lighting and Protection** ***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.***	Acceptable
C.8	**Maintenance Standard (Support of GMPs, Housekeeping, Lubricants)** ***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.***	Acceptable

Section D. Sanitation, Housekeeping and Hygiene		
No	**Question/Notes**	**Result**
D.1	**Master Sanitation Schedule and Monitoring** ***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.***	Acceptable
D.2	**Standard Sanitation Operating Procedures and Monitoring** ***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.***	Acceptable
D.3	**Cleaning Chemical and Sanitizer Control** ***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.***	Acceptable

Section D. Sanitation, Housekeeping and Hygiene		
No	**Question/Notes**	**Result**
D.4	**Pre Operational Monitoring and Corrective Action** ***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.***	Acceptable
D.5	**Verification of Cleaning Effectiveness** ***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".***	Acceptable
D.6	**Operational Housekeeping and Monitoring** ***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 debtris was observed in any area of the facility.***	Acceptable
D.7	**Personal Hygiene and Good Manufacturing Practices** ***A number of the required hygiene requirements are included throughout the policy documents and are considered adequate for this operation.***	Acceptable
D.8	**Internal Audits and Corrective Actions** ***An Internal Audit of the operation was conducted in November 2016. A few deficiencies were noted with appropriate corrective action. Internal audits are done annually.***	Acceptable

Section E. Rodent and Pest Control Management		
No	**Question/Notes**	**Result**
E.1	**Documented and Specific Pest Control Program** ***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.***	Acceptable
E.2	**Outside Premises Management (Grounds, Waste Disposal Areas)** ***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.***	Acceptable
E.3	**Inside Premises Management** ***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 weekly.***	Acceptable
E.4	**Pest Tight Doors and Entrance Closures** ***All doors have good seals. No issues observed.***	Acceptable
E.5	**Secure Storage and Documentation of Pest Related Chemicals** ***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.***	Acceptable
E.6	**Detailed Activity Reports with Corrective Actions** ***Reports are provided for each inspection. Records reviewed were complete and current.***	Acceptable

Section F. Approved Suppliers, Receiving and Inventory Control		
No	**Question/Notes**	**Result**
F.1	**Supplier Approval Policies and Procedures** ***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.***	Acceptable
F.2	**Incoming Vehicle Inspection and Documentation** ***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.***	Acceptable
F.3	**Release Criteria for Ingredients** ***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 singing off that it meets the customer requirements.***	Acceptable
F.4	**Storage and Handling Policies and Practices**	Acceptable

Section F. Approved Suppliers, Receiving and Inventory Control		
No	**Question/Notes**	**Result**
	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.	
F.5	**Bulk Receiving Systems Sanitation and Monitoring** ***No bulk materials are handled.***	N/A
F.6	**Restricted and/or Sensitive Ingredient Control, Including Chemical Compounds** ***All non-food products are stored on one side of the warehouse which is separated by the decommissioned cooler area wall. Within this area, hazardous materials are stored in designated aisles. Food products are stored on the other side of the warehouse in designated areas. In many areas of the facility, whole aisles and associated racking is dedicated to product types or specific customers.***	Acceptable

Section G. Process and Product Evaluation		
No	**Question/Notes**	**Result**
G.1	**Process Control and Documentation Procedures** ***No processing occurs. Products in storage are received already packed and boxed from the supplier / manufacturer. Records for receipt, storage and shipping operations were reviewed, and appear to be complete.***	Acceptable
G.2	**Specification and Formulation Control and Accuracy** ***No specification or formulation control is required. No products are produced.***	N/A
G.3	**Routine Calibration of Operational Equipment and Measuring Devices** ***No equipment requires calibration.***	N/A
G.4	**Foreign Material Control** ***Glass and allergen control procedures are documented, and are appropriate for the facility, No foreign material control devices or program is required. A visual examination of the received pallet condition is done.***	Acceptable
G.5	**Application of Statistical Control** ***No statistical control is required. No products are produced.***	N/A
G.6	**Allergen and Sensitive Ingredient Controls** ***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.***	Acceptable
G.7	**Specification Compliance Documentation** ***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.***	N/A
G.8	**Rework and Carryover Products** ***No rework occurs. No products are produced.***	N/A
G.9	**Analytical Records Management** ***Analytical records are not required.***	N/A

Section H. Packaging and Labeling		
No	**Question/Notes**	**Result**
H.1	**Label Accuracy and Regulatory Compliance** ***No labeling occurs. No products are produced.***	N/A
H.2	**Documented Net Weight or Count Compliance Policy and Performance** ***Quantities received and shipped are verified during the processes. No products are produced. No net weight or count compliance is required.***	Acceptable
H.3	**Clear Manufacturing Codes on Individual and Cased Product** ***Products are identified with pallet tags at receipt. All products do contain accurate and clear codes, but these are the responsibility of the manufacturer / customer.***	Acceptable
H.4	**Package Integrity and Function** ***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.***	Acceptable
H.5	**Label Security and Obsolete Label Controls** ***No labeling is done. No product labels are stored.***	N/A

Section I. Storage and Shipping		
No	**Question/Notes**	**Result**
I.1	**Warehouse and Finished Product Management** ***All incoming products are tagged with received date.***	Acceptable
I.2	**Retained and Returned Products** ***Facility has documented procedures for receiving, shipping, recall and damaged products. Procedures mention identification of product through red tags.*** ***Deviation: No clear hold procedure, for control of product with the facility is documented.***	Non-Conformance*
I.3	**Storage Facility and Dock Maintenance** ***Dock area and staging areas are clean and well maintained.***	Acceptable
I.4	**Transport Condition** ***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.***	Acceptable
I.5	**Release Authorization to Ship Product** ***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 botht eh picker and verifier to release the order.***	Acceptable

Section J. Training Requirements		
No	**Question/Notes**	**Result**
J.1	**New Hire Training** ***All new hires are trained on all aspects of food safety, hygiene / GMPs, etc., plus job specific duties. An Employee Handbook is aloso provided which contains company policies. Records are maintained, and observed during the audit.***	Acceptable
J.2	**Training Language** ***All training has been in English. All employees speak English.***	Acceptable
J.3	**Prerequisite Program Training** ***All employees receive training in facility maintenance (cleaning and sanitation). Records are available.***	Acceptable
J.4	**Refresher Training** ***Refresher training occurs annually as per each calender year.***	Acceptable
J.5	**Proof of Knowledge** ***The facility training records include training session contents, date, time, and proof of knowledge confirmation.*** ***Deviation: The proof of knowledge confirmation is initialed by the trainer, but no supporting records were available for review.***	Non-Conformance*
J.6	**Training Records** ***Records are available, maintained for each employee. Records observed during audit appeared complete and current.***	Acceptable
J.7	**Training Program Review** ***The training program is included in the annual review.***	Acceptable

Section K. Food Defense		
No	**Question/Notes**	**Result**
K.1	**Management** ***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.***	Acceptable
K.2	**Human Element** ***The President does hiring and knows all employees. All visitors must be allowed into the facility (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.***	Acceptable
K.3	**Facility** ***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.***	Acceptable
K.4	**Operations** ***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.***	Acceptable