# HACCP Plan

*Carbonated Beverages


**Dupont Street Imports LLC**
233 Eagle Street,
Brooklyn, NY 11222

# Food Safety Management System Modifications Record

Processes:

- Carbonation
- Canning/bottling

## The Food Safety Management System shall be dated and signed upon initial acceptance, upon any modification, and at least annually, upon reassessment.

## Modification Information

Date and Time

Version Number

Previous Version

Description of modification

HACCP Coordinator Name

HACCP Coordinator Signature

# Contents

# PL-D-ED Establishments details

| | |
|---|---|
| **Establishment Name** | Dupont Street Imports LLC |
| **Address** | 233 Eagle Street,<br>Brooklyn, NY 11222 |
| **Person in charge/ HACCP Coordinator** | Steven DeAngelo<br>(646)339-3719<br>steven@greenhookgin.com |
| **HACCP Consultant** | Benjamin Cote – iQKitchen Inc.<br>ben@iqkitchen.co |

# PL-D-DP Description of the process

This HACCP plan for Dupont Street Imports LLC covers the production of:

- Carbonated Beverage: St. Agrestis Phony Negroni

The establishment receives food products from licensed suppliers. Suppliers that fall under USDA or FDA jurisdiction are required to provide proof of passable inspection, HACCP summary plan, or third-party inspections through the supply chain qualification process. Suppliers that fall under local jurisdiction are required to provide proof of passable inspection and/or appropriate license.

Case lots of shelf-stable food are received, examined for signs of spoilage, and immediately stored in a clean designated area elevated from the floor.

For the production of the beverage, Dupont Street Imports LLC combines and prepares ingredients in chosen manner. The pH is checked to be sure it is 3.30 or lower and adjusted with citric acid if needed. It is ensured that the volume of alcohol is ≤ 0.5%. The product is then pressurized with $CO_2$. To finish the product, clean containers are filled with the product and sealed. Beverages are placed in dry storage and ready for distribution. pH testing is performed after equilibration or before shipping to be sure it is 3.30 or lower.

This HACCP plan addresses equipment calibration, sanitation of the equipment and preparation areas, prevention of contamination of food by employees, and training and documentation requirements surrounding the processes enclosed. All records related to activities found in this document are to be stored for a minimum of two years and to be made easily accessible upon request from a regulatory inspector.

This HACCP plan has been reviewed and approved by the person in charge and the HACCP coordinator and will be subject to annual reassessment as well as in the event of any major change to the product or process, after the identification of any new potential hazards, after the discovery that controls of a critical point is ineffective or after the detection of an unanticipated problem.

# PL-D-PD Product description

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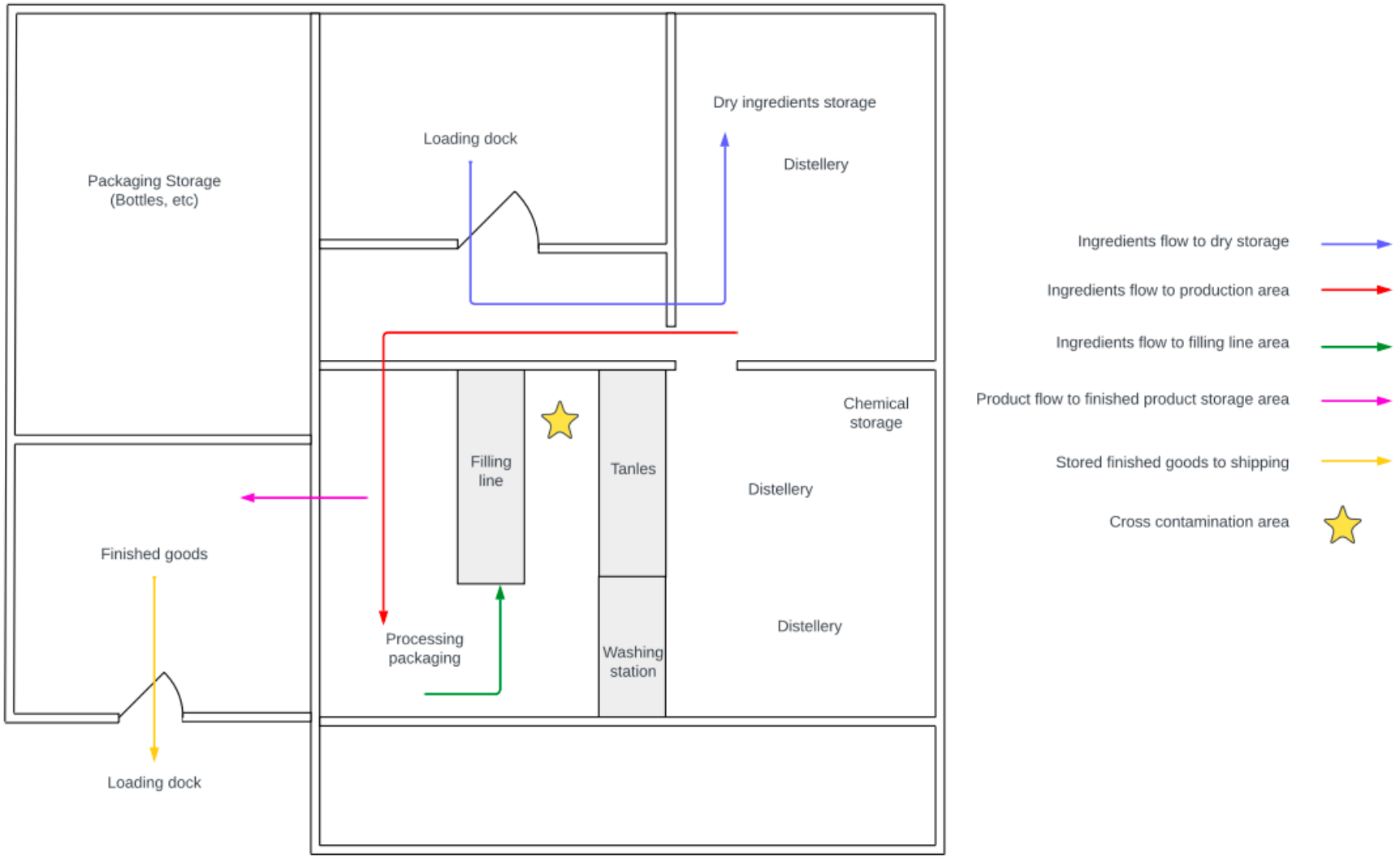
|---|---|
| **Product name** | Carbonated Beverage: St. Agrestis Phony Negroni |
| **Ingredients** | Water, sugar, flavor extract 3 liquid (citrus peel), citric acid, flavor extract liquid 1 (hibiscus, chamomile, rose petal, orris root), flavor extract 2 liquid (turkey rhubarb root, gentian root, cascara bark, myrrh gum resin), flavor extract powder 4 (gentian root), flavor extract 5 powder (turkey rhubarb extract)., phosphoric acid, sodium benzoate, and quinine sulfate. |
| **Packaging used** | Crown caps, glass bottles, and outer box. |
| **Intended use** | Ready to drink. |
| **Intended consumers** | General public. |
| **Shelf life** | 12 months |
| **Labeling instructions** | The label must include product common name, storage condition (shelf stable), ingredient list, nutritional labeling, and manufacturer information. |
| **Instructions related to safety** | Refrigerate after opening. |
| **Storage and distribution** | Distribution direct to consumer. Shelf-stable, product stored and distributed at room temperature. |

# PL-D-ME Materials and Equipment

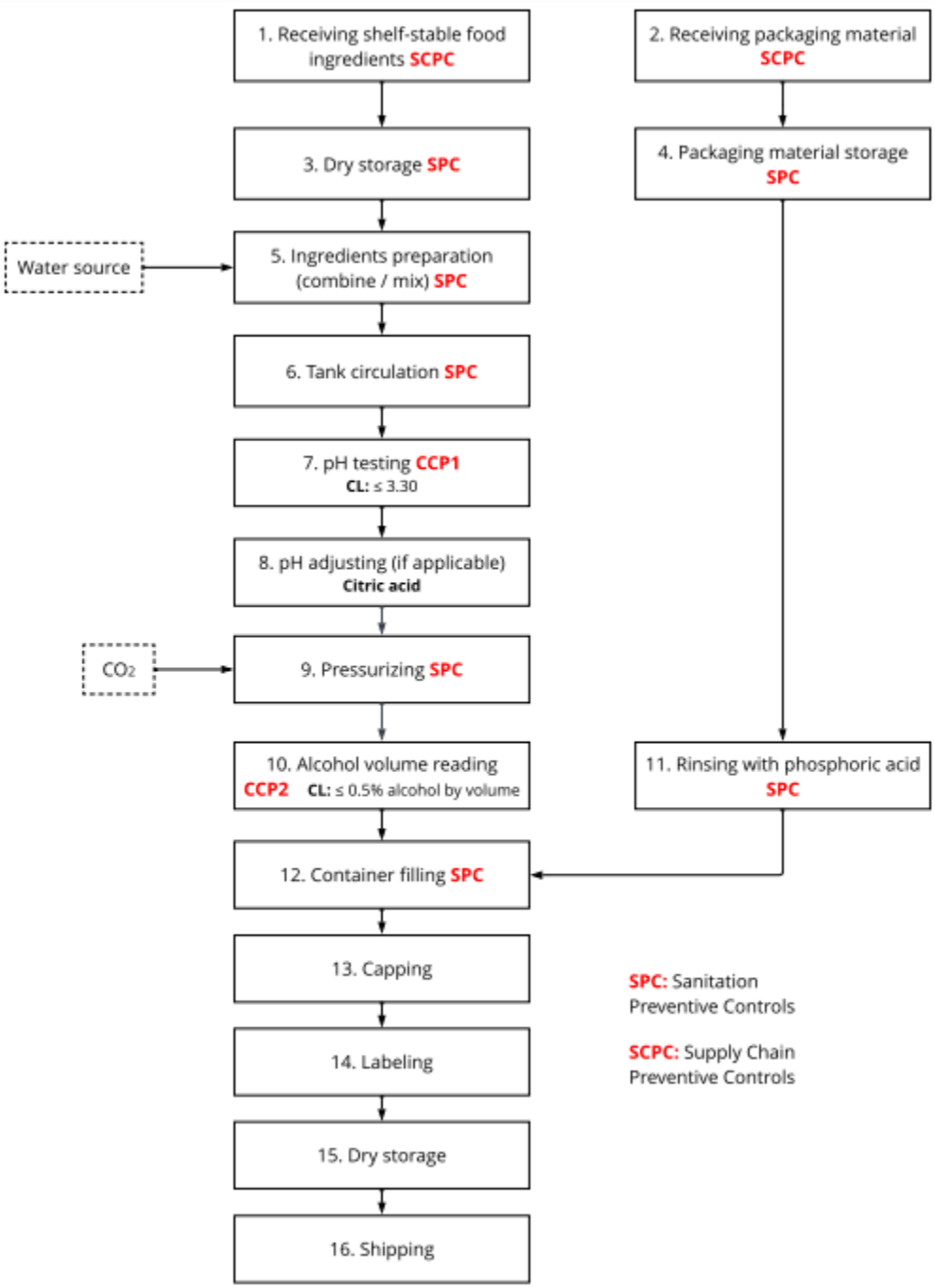
| Name | Description |
|---|---|
| Counterpressure filling block | ABE counterpressure filling block (rinser, filler, capper, outbound conveyor) |
| Plate and frame filter | 40x40 plate and frame filter using 45-micron pads |
| Pressure Tanks | 2000 LITER Pressure Tanks with sanitary fittings (triclamp) |
| Luminometer | |

Dupont Street Imports LLC
233 Eagle Street,
Brooklyn, NY 11222

# PL-D-ME Floor plan



# PL-D-PF Process Flow



# PL-D-HA Hazard Analysis

## Hazard inputs

| Inputs | Potential Hazards<br>(B) Biological (C) Chemical (P) Physical | Controlled at |
|---|---|---|
| Water | B) Presence of viruses (e.g., Enterovirus). Presence of parasites (e.g., *Toxoplasma gondii, Cryptosporidium*). Presence of pathogenic bacteria (e.g., *Salmonella spp., Campylobacter jejuni, Shigella spp*.)<br>(C) Contamination by non-food chemicals. Presence of environmental contaminants (e.g., heavy metals, pesticides). Presence of excess levels of water treatment chemicals (e.g., chlorine).<br>(P) Contamination of hazardous extraneous material. | Ingredients integrity are inspected to ensure no foreign material is present, chemicals are not transported with food, and they are properly handled.<br><br>Approved supplier program SOP., Receiving SOP and record.<br><br>Ingredients are immediately stored properly in the dry area. General Storage SOP and Pre-Operation record.<br><br>Products are rotated and used FIFO. Personnel - health and hygiene requirements SOP, Product handling requirements and prevention of cross-contamination SOP, Pest signs as rodent droppings and insects, should be reported and the pest control activities are reinforced. |
| Flavors | B) No common hazard.<br>(C) Use of non-food grade product. Contamination by non-food chemicals. Presence of toxic herbs, unapproved substances / novel foods or substances with other physiological effects / properties poses a potential hazard.<br>(P) Contamination of hazardous extraneous material. | |
| Sugar | (B) No common hazard.<br>(C) Use of non-food grade product. Presence of non-permitted food additives or food additives exceeding the authorized level.<br>(P) Contamination of hazardous extraneous material. | |
| Phosphoric acid/ Citric acid | (B) No common hazard.<br>C) Use of non-food grade product. Contamination by non-food chemicals. | |

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|---|---|---|
| | (P) Contamination of hazardous extraneous material. | |
| Sodium benzoate | B) No common hazard.<br>(C) Use of non-food grade product.<br>(P) Contamination of hazardous extraneous material. | |
| Quinine sulfate | B) No common hazard.<br>(C) Use of non-food grade product. Contamination by non-food chemicals. Presence of toxic herbs, unapproved substances / novel foods or substances with other physiological effects / properties poses a potential hazard.<br>(P) Contamination of hazardous extraneous material | |

# Hazard Analysis

CCP (Critical Control Point)

*SPC Sanitation Preventive Control, SCPC Supply Chain Preventive Control

| Processing Step | Potential Food Safety hazards introduced, controlled, or enhanced at this step (B) Biological (C) Chemical (P) Physical | Are any potential Food Safety hazards requiring preventive control? | Justification | What preventive control measure(s) can be applied to significantly minimize or prevent the Food Safety hazard? | Is the critical control point or preventive control applied at this step? |
|---|---|---|---|---|---|
| 1. Receiving shelf-stable food ingredients | (B) No common hazard | (B) NA | (B) NA | Visual inspection for foreign material or damaged packages and label inspection. Ingredients must be from an approved supplier that provides letter of guarantee or certificate of analysis.<br><br>SCPC and records: Approved supplier program, Receiving. | **Yes: SCPC** |
| | (C) Presence of non-permitted food additives or food additives exceeding the authorized level. Contamination by non-food chemicals. | (C) Yes. | (C) The supplier may improperly transport the ingredients, exposing them to chemicals. Other chemicals contaminants could be present if proper GMPs are not followed by the manufacturer. | | |
| | (P) Presence of hazardous extraneous material. | (P) Yes. | (P) Hazardous extraneous material could be present if proper GMPs are not followed by the manufacturer. | | |

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| 2. Receiving packaging material | (B) No common hazards. | (B) NA | (B) NA | Suppliers demonstrate that packaging material is transported in appropriate conditions (covered or segregated from chemicals). Visual inspection for foreign material or damaged packages and label inspection.<br><br>SCPC and records: Approved supplier program, Receiving. | **Yes: SCPC** |
| | (C) Deleterious chemicals. | (C) Yes. | (C) The supplier may improperly transport the ingredients, exposing them to chemicals. | | |
| | (P) Presence of hazardous extraneous material. | (P) Yes. | (P) Packaging material may contain foreign material due to supplier not complying with specifications. | | |
| 3. Dry storage | (B) Pathogen contamination due to inappropriate storage conditions (e.g., insects, or the environment). | (B) Yes. | (B) The absence of facility maintenance, poor pest control, and improper storage of ingredients may contaminate ingredients. | Products must be stored in designated areas following FIFO rule and cleaning and sanitation procedures to prevent contamination.<br><br>SPC and records: Cleaning and sanitizing direct food contact surfaces and equipment, Pest Control, Pre-operation inspection, Foreign material control program and Maintenance program. | **Yes: SPC** |
| | (C) Cross-contamination by non-food chemicals (e.g., cleaners, sanitizers, and lubricants). | (C) Yes. | (C) The absence of employee training and cleaning/storage procedures, as well as the use of non-food grade chemicals, can result in cross-contamination. | | |

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| | (P) Contamination from hazardous extraneous material (e.g., dirt, metal, rubber, plastic, glass). | (P) Yes. | (P) Improper cleaning and inspection operations can result in contamination by foreign material. | SOPs and records: General storage SOP | |
| 4. Packaging material storage | (B) No common hazard | (B) NA | (B) NA | Suppliers demonstrate that packaging material is transported in appropriate conditions (covered or segregated from chemicals). Visual inspection for foreign material or damaged packages and label inspection.<br><br>SCPC and records: Approved supplier program, Receiving. | **Yes: SCPC** |
| | (C) Cross-contamination by non-food chemicals (e.g., cleaners, sanitizers, and lubricants) | (C) Yes. | (C) The absence of employee training and cleaning/storage procedures, as well as the use of non-food grade chemicals, can result in cross-contamination. | | |
| | (P) Contamination from hazardous extraneous material (e.g., dirt, metal, rubber, plastic, glass). | (P) Yes. | (P) Improper cleaning and inspection operations can result in contamination by foreign material. | | |

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| 5. Ingredients preparation (combine/mix) | (B) Pathogen contamination (e.g., *E. coli* spp., Enterococcus, fecal coliforms, *L. monocytogenes, Salmonella spp.)* | (B) Yes. | (B)There is a risk of contamination by pathogens if the water used for the company's activities is not monitored periodically. Inadequate sanitizing of food contact surfaces and utensils or improper product handling can contaminate product and *Salmonella spp.* contamination occasionally occurs in food products. | SPC:<br>Cleaning and sanitizing direct food contact surfaces and equipment. Maintenance program. Pre-operation<br>Inspection, Safety of the water source, and Foreign material control program.<br><br>SOPs and records: Personnel - health and hygiene requirements, Product handling requirements, and Production. | **Yes: SPC** |
| | (C) Cross-contamination from non-food chemicals (e.g., cleaners, sanitizers, and lubricants). | (C) Yes | (C) The absence of employee training and cleaning procedures, as well as the use of non-food grade chemicals, can result in cross-contamination. | | |
| | (P) Contamination from hazardous extraneous material. (e.g., dirt, metal, rubber, plastic). | (P) Yes | (P) Risk of contamination if the utensils and facility are not inspected, maintained, and cleaned frequently. | | |

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| 6. Tank circulation | (B) Pathogen contamination (e.g, *Salmonella spp., Listeria monocytogenes)* | (B) Yes. | (B) Inadequate sanitizing of equipment or improper product handling can contaminate the product. | SPC:<br>Cleaning and sanitizing direct food contact surfaces and equipment.<br>Maintenance program. Pre-operation<br>Inspection, and Foreign material control program.<br><br>SOPs and records: Personnel - health and hygiene requirements, Product handling requirements, and Production. | **Yes: SPC** |
| | (C) Cross-contamination from non-food chemicals (e.g., cleaners, sanitizers, and lubricants). | (C) Yes | (C) The absence of employee training and cleaning procedures, as well as the use of non-food grade chemicals, can result in cross-contamination. | | |
| | (P) Contamination from hazardous extraneous material. (e.g., dirt, metal, rubber, plastic). | (P)Yes. | (P) Risk of contamination if the utensils, equipment, and facility are not inspected, maintained, and cleaned frequently. | | |
| 7. pH testing | (B) Pathogen growth (e.g., *Salmonella ssp., E. coli)* | (B) Yes | (B) Growth of pathogens if the product doesn't achieve the required pH. | pH testing CCP and Production record. | **Yes: CCP1 pH testing** |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) No common hazard. | (P) NA | (P) NA | | |
| | (B) No common hazard. | (B) NA | (B) NA | SOP and records: Personnel | No |

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| 8. pH adjusting (if applicable) | (C) No common hazard. | (C) NA | (C) NA | - health and hygiene requirements, Product handling requirements, and Production. | |
| | (P) No common hazard. | (P) NA | (P) NA | | |
| 9. Pressurizing | (B) Pathogen growth and contamination (*Salmonella ssp., E. coli*) | (B) Yes. | (B) Inadequate sanitizing of equipment or improper product handling can contaminate product. | Scheduled cleaning and maintenance of the equipment to prevent the presence of foreign materials. The equipment will be cleaned with food-grade chemicals before production activities.<br><br>SPC:<br>Cleaning and sanitizing direct food contact surfaces and equipment. Maintenance program. Pre-operation Inspection, and Foreign material control program.<br><br>SOPs and records:<br>Personnel - health and hygiene requirements, Product handling requirements, and Production. | **Yes: SPC** |
| | (C) Quality and purity of carbon dioxide do not meeting the standards used in beverages. | (C) No | (C) $CO_2$ meets the standard of quality and purity. | | |
| | (P) Contamination from hazardous extraneous material. (e.g., dirt, metal, rubber, plastic, glass). | (P)Yes. | (P) Risk of contamination if the utensils, equipment, and facility are not inspected, maintained, and cleaned frequently. | | |
| | (B) No common hazard | (B) NA | (B) NA | Alcohol volume reading CCP | |

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| 10. Alcohol volume reading | (C) High alcohol content of the product | (C) Yes | (C) The alcohol content of the finished product must be ≤ 0.5% AVB. | and Production record. | **Yes: CCP2 Alcohol volume reading** |
| | (P) No common hazard. | (P) NA | (P) NA | | |
| 11. Rinsing with phosphoric acid | (B) Pathogen contamination due to improper product handling. (*Salmonella spp., E. coli)* | (B) Yes. | (B) Inadequate sanitizing of containers or improper product handling can contaminate products. | SPC:<br>Cleaning and sanitizing equipment and general cleaning, Pre-operation Inspection, and Foreign material control program.<br><br>SOPs and records: Personnel - health and hygiene requirements, Product handling requirements, and Production. | **Yes: SPC** |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) Contamination from hazardous extraneous material. (e.g., dirt, metal, rubber, glass). | (P) No | (P) Visible foreign material that could compromise product safety will be removed during cleaning operations. | | |
| 12. Contanier filling | (B) Pathogen contamination due to improper product handling. (*Salmonella spp., E. coli*) | (B) Yes. | (B) Inadequate sanitizing of food contact surfaces and utensils or improper product handling can contaminate products. | SPC:<br>Cleaning and sanitizing equipment and general cleaning, Pre-operation Inspection, and Foreign material control program.<br><br>SOPs and records: Personnel - health and hygiene requirements, Product handling requirements, and Production. | **Yes: SPC** |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) Contamination from hazardous extraneous material. (e.g., glass from bottles). | (P) Yes | (P) Risk of contamination if the packaging material and facility are not inspected, and cleaned frequently | | |

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| 13. Capping | (B) Pathogen contamination due to improper product handling. (*Salmonella spp., E. coli*) | (B) No | (B) Employees are trained in GMPs to avoid contamination.. | SOPs and records: Personnel - health and hygiene requirements, Product handling requirements, and Production. | No |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) No common hazard | (P) NA | (P) NA | | |
| 14. Labeling | (B) No common hazard | (B) NA | (B) NA | Production, and Labeling requirements. | No |
| | (C) No common hazard | (C) NA | (C) NA | | |
| | (P) No common hazard | (P) NA | (P) NA | | |
| 15. Dry storage | (B) No common hazard. | (B) NA | (B) NA | The finished product is sealed and the container integrity is inspected to prevent contamination. The product is stored in a designated clean area. | No |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) No common hazard. | (P) NA | (P) NA | | |
| 16. Shipping | (B) No common hazard. | (B) NA | (B) NA | Finished products release and shipping SOP and Pre-shipment review record. | No |
| | (C) No common hazard. | (C) NA | (C) NA | | |
| | (P) No common hazard. | (P) NA | (P) NA | | |

# PL-D-CCP Critical Control Points

| | | |
|---|---|---|
| **Critical Control Point** | CCP1 pH Testing | |
| **Hazards** | (B) Pathogen growth (e.g., *Salmonella ssp., E. coli*) | |
| **Critical limits** | Carbonated beverages: pH must be ≤3.30 | |
| **Monitoring** | **What** | pH of the finished product. |
| | **How** | 1. The pH must be measured using a calibrated pH meter.<br>2. The calibration of the pH meter will be performed according to the SOP-D-PH pH Meter Calibration.<br>3. Measure the pH of the product before pressurizing. |
| | **When** | Every product batch. |
| | **Who** | Trained employee. |
| **Corrective actions** | 1. In the event of a deviation of the critical limit, the establishment will implement corrective actions following the requirements of 9 CFR 417.3(a):<br>a. The cause of the deviation is identified and eliminated;<br>b. The CCP will be under control after the corrective action is taken;<br>c. Measures to prevent recurrence are established; and<br>d. No product that is injurious to health or otherwise adulterated as a result of the deviation enters commerce.<br>2. The person in charge or designated alternate will record the deviation and corrective actions in a deviation report. | |
| **Verification** | **What** | Direct observation of monitoring activities and completed production records, pH meter calibration record, and thermometer calibration record. |
| | **When** | The observation of the monitoring activities will be performed daily during verification activities.<br>The revision of the production records, pH meter calibration record, and thermometer calibration record will be done daily during verification activities. |
| | **Who** | Person in charge or designated alternate. |
| **Records** | CCP-R-PR Production Record<br>SOP-R-PH pH Meter Calibration.<br>SOP-R-DR Deviation Report.<br>All records are maintained for a minimum of 2 years. | |

| | | |
|---|---|---|
| **Critical Control Point** | CCP2 Alcohol volume reading | |
| **Hazards** | (C) High alcohol content of the product | |
| **Critical limits** | Alcohol content of the product must be ≤ 0.5%. | |
| **Monitoring** | **What** | Alcohol percentage of the product. |
| | **How** | 1. Measure the alcohol content using a refractometer.<br>2. Record the alcohol percent on the CCP-R-PR Production record. |
| | **When** | Every product batch, before container filling. |
| | **Who** | Trained employee. |
| **Corrective actions** | 1. In the event of a deviation of the critical limit, the establishment will implement corrective actions following the requirements of 9 CFR 417.3(a):<br>a. The cause of the deviation is identified and eliminated;<br>b. The CCP will be under control after the corrective action is taken;<br>c. Measures to prevent recurrence are established; and<br>d. No product that is injurious to health or otherwise adulterated as a result of the deviation enters commerce.<br>2. The person in charge or designated alternate will record the deviation and corrective actions in a deviation report. | |
| **Verification** | **What** | Adherence to alcohol volume reading procedures and complete CCP-R-P Production record.. |
| | **When** | The observation of the monitoring activities will be performed daily during verification activities.<br>The revision of the production records will be done daily during verification activities. |
| | **Who** | Person in charge or designated alternate. |
| **Records** | CCP-R-PR Production Record<br>SOP-R-PH pH Meter Calibration.<br>SOP-R-DR Deviation Report.<br>All records are maintained for a minimum of 2 years. | |

# PL-D-SCPC Supply Chain Preventive Controls

## SOP-D-RE Receiving

PURPOSE AND INTRODUCTION

This procedure establishes the steps necessary to evaluate the products received or collected. Items must be evaluated to verify that the load meets our specifications, and the requirements in place to ensure that only wholesome products of good integrity are accepted.

CRITERIA AND INSTRUCTIONS

1. The person who accepts items is informed about receiving procedures.
2. Delivery time negotiated with the supplier allows for items to be checked in and/or to set up an alternate check-in procedure with the delivery person.
3. A rejection policy has been established to ensure accurate, timely, consistent, and effective refusal/return of rejected goods. Items that are rejected are noted on the invoice or packing slip.
4. Tools needed to check in deliveries are kept in a specific location near the receiving area. These tools include invoice or purchase orders, receiving records, pens, and clean loading carts.
5. The receiving area and delivery vehicle must be clean, and chemicals should not be transported with the food.
6. The food must not show signs of spoilage and the packaging must not be damaged, exposing food to contamination.
7. All products must be properly labeled with the name and address of the manufacturer, use-by-date, and ingredients. If no date is written on the labels, write receiving date with a marker.

FREQUENCY

This SOP will be followed every time an item is received.

MONITORING

Every time products are received, the designated employee must:

1. Go to receiving board and take the corresponding order.
2. Check off the items: check items off the list that were received via the packing slip and the actual order sheet.
3. Check the quality of items received – ensure no damaged items:

a. Check the condition of all boxes for physical damage, water damage, or infestation.
b. Check all labels to ensure compliance. Match labels to all paperwork. Check expiration dates and allergen claims.
c. Check the receiving area and delivery vehicle are clean and there are no chemicals transported with the food.
d. Complete and sign the SOP-R-RS Receiving Shelf Stable Items record.
e. Attach the order (or a copy of it) to SOP-R-RS Receiving Shelf Stable Items records.
f. Label all the products received with the receiving date.

CORRECTIVE ACTIONS

1. Reject any product that was not ordered - that is not on the order-.
2. If there is any sign of spoilage of food or packaging, the product must be returned.
3. If the condition of the delivery vehicle is not appropriate or the product label is wrong/incomplete, the product must be returned.
4. Record the deviation and corrective action on the SOP-R-RS Receiving Shelf Stable Items records.

VERIFICATION AND RECORD-KEEPING

Person in charge or designated alternate checks for adherence to receiving procedures and for completing SOP-R-RS Receiving Shelf Stable Items records while performing monthly HACCP audit. If a deviation occurs, the event and corrective actions must be recorded in an SOP-R-DR Deviation Report. All records are maintained for a minimum of 2 years.

## SOP-D-AS Approved supplier program

PURPOSE AND INTRODUCTION

Supplier approval ensures that suppliers of raw materials and services meet acceptable standards of food safety, legality, quality and authenticity, service, and ethical trading. The ongoing monitoring of these suppliers ensures that legal and contractual arrangements are met following any agreed standard, specification, contract, or service schedule.

CRITERIA AND INSTRUCTIONS

Dupont Street Imports LLC receives products from licensed suppliers.

| Sources products | Documents required to provide |
|---|---|
| Suppliers that fall under FDA jurisdiction | 1. Proof of the passable inspection (license to operate)<br>2. Facility FDA registration and Bioterrorism statement. |

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|---|---|
| | 3. Any and the following<br>a. Preventive Control summary plan<br>b. Third-party inspections through the supply chain qualification process.<br>c. Certificates of analysis or letters of guarantee. |
| Suppliers that fall under local jurisdiction | 1. Proof of passable inspection and/or appropriate license.<br>2. Certificates of analysis or letters of guarantee |
| Foreign suppliers | 1. Product specifications that are designed to ensure that the product is not adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act.<br>2. Statement of compliance to FSMA'S rule on FSVP and Sanitary Transportation of Human Food.<br>3. HACCP plan for each product<br>4. A continuing or lot-by-lot certificate from an appropriate foreign government inspection authority or competent third party certifying that the imported product is or was processed in accordance with the requirements of the FDA. |

FREQUENCY

Suppliers must be evaluated and approved before goods or services are purchased. Approved suppliers are identified in the SOP-R-AS Approved Supplier. Ongoing approval for all suppliers is based on the maintenance of the initial approval conditions. The SOP-R-AS Approved Supplier will be updated when new suppliers are added or when current suppliers are de-listed.

RESPONSIBILITIES

1. The person in charge can propose new suppliers.
2. The person in charge is responsible for ensuring that suppliers are evaluated and approved before they supply materials.
3. The person in charge is responsible for maintaining records of evaluation in the supplier files.
4. The person in charge is responsible for evaluating suppliers.
5. The person in charge is responsible for documenting supplier product problems.

MONITORING

1. The person in charge documents any problems with suppliers.
2. The person in charge performs a yearly evaluation of the suppliers upon HACCP plan reassessment.
3. The person in charge keeps all the information related to a supplier in a file.

CORRECTIVE ACTIONS

1. If recurring problems are noted in a short period, the HACCP coordinator will re-evaluate the supplier.
2. The HACCP coordinator will obtain and keep in a file all the missing or out-of-date documents.

VERIFICATION AND RECORD-KEEPING

The HACCP coordinator will check for adherence to the supplier verification procedures while performing the monthly HACCP audit. All records are maintained for a minimum of 2 years.

# PL-D-SPC Sanitation Preventive Controls

## SSOP-D-CE Cleaning and sanitizing direct food contact surfaces and equipment.

PURPOSE AND INTRODUCTION

All food contact surfaces shall be cleaned and sanitized to remove food residues and dirt which are a source of contamination. This SOP follows FDA and State Food Code regulations for cleaning and sanitation practices.

All employees involved in food preparation must:

1. Be trained on this SOP and follow the manufacturer's instructions to clean and sanitize equipment and other surfaces at the facility
2. Follow the procedures described for handling and storage of chemical compounds used in the establishment.

CRITERIA AND INSTRUCTIONS

**Use, handling, and storage of chemicals**

1. Cleaning compounds, sanitizers, and lubricants are stored separately from any food products and have updated SDS (Safety Data Sheets) or MSDS (Material Safety Data Sheets) that are accessible to all employees.
2. Small amounts of cleaning compounds, sanitizers, and lubricants used in receiving, processing, and packaging areas are labeled to identify the product.
3. Food, food-packaging materials, and food-contact surfaces are protected from adulteration by biological, chemical, and physical contaminants.

| **Cleaners and sanitizers** | | |
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| Name | Description | Directions for use |
| PBW | Buffered alkaline detergent for Circulation cleaning | **Concentration:**<br>1 to 3 ounces per gallon depending on soil load.<br><br>Instructions:<br>1. Heat at 130°F (54.4°C) to 180°F (82.2C) for 30 minutes<br>2. When using P.B.W. in food processing areas the equipment that has been cleaned must be rinsed with potable water. Just prior to use, sanitize the equipment in accordance with public health standards. |
| SaniClean | Blend of phosphoric | **Concentration:**<br>Mix 1 oz. Saniclean for every 3 gal. of water. |

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| | acid and Sulfonate Oleic Acid<br>Final rinse product | Instructions:<br>1. Apply on the surface with cloth, mop, sponge, spray, or immersion.<br>2. If using spray application, use a coarse mist, pump, or trigger sprayer and spray 6-8 inches from the surface and follow up with a brush or sponge.<br>3. Allow for contact time of at least 2-3 minutes.<br>4. Drain, but do not rinse. |
| Ethanol | Sanitizing food equipment. | **Concentration:**<br>62 – 71% ethanol<br><br>Instructions:<br>1. Spray the alcohol solution directly onto the equipment.<br>2. Let dry |
| Sanitizer | | |

**General cleaning procedures**

1. Cleaning activities described below will occur at the end of every production run to ensure the next production run occurs properly and hygienically.
2. Perform cleaning and sanitization activities in an area after unscheduled emergency repairs or maintenance to processing equipment or the building interior (e.g., walls, ceilings, and plumbing).
3. Report any damage or malfunction detected during cleaning activities.

| **Food Contact Surfaces Cleaning Activities** | | | |
|---|---|---|---|
| Frequency | Items | Activities | Procedure |
| Daily | Equipment: Counterpressure filling block, Plate and frame filter, and Pressure Tanks | Wash and sanitize:<br>1. Before activities.<br>2. End of shift<br>3. Any time contamination occurs or is suspected. | 1. Wash with a detergent solution.<br>2. Rinse with clean water.<br>3. Sanitize using a sanitizing solution.<br>4. Place wet items in a manner to allow air drying.<br><br>**3-compartment sink setup:**<br>1. Compartment 1: Detergent solution.<br>2. Compartment 2: Clean water.<br>3. Compartment 3: Sanitize with sanitizing solution. Test the concentration with test strips or equivalent. |

| | | | |
|---|---|---|---|
| | | | 4. Drain and refill compartments periodically and as needed to keep the water clean. |
| Weekly | Equipment, Counterpressure filling block, Plate and frame filter, and Pressure Tanks, and tanks | Deep cleaning and sanitizing | 1. Wash with a detergent solution.<br>2. Rinse with clean water.<br>3. Sanitize using a sanitizing solution.<br>4. Place wet items in a manner to allow air drying. |

| **Non-Food Contact Surfaces Cleaning Activities** | | | |
|---|---|---|---|
| Frequency | Items | Activities | Procedure |
| Daily | Floors | Sweep and mop. | 1. Sweep floors and remove all large debris.<br>2. Mop with sanitizing solution. |
| | Garbage containers | Empty and clean. | 1. Empty every 24 hours or when full.<br>2. Clean with proper detergent and sanitizing solution each time garbage containers are emptied. |
| | Dispensers of sanitizing | Refilled | 1. Remove residues.<br>2. Clean dispensers outside and inside before refill.<br>3. Refill. |
| | Toilet | Clean and sanitize at the beginning of the shift. | 1. Clean and scrub with detergent and a brush to remove all dirt, stains, and rubbish.<br>2. Clean the wall tiles.<br>3. Rinse with clean water.<br>4. Sanitize toilets with a sanitizing solution. |
| | Hoses, and deaerated tank. | Wash and sanitize:<br>1. Before activities.<br>2. End of shift<br>Any time contamination occurs or is suspected. | 1. Wash with a detergent solution.<br>2. Rinse with clean water.<br>3. Sanitize using a sanitizing solution.<br>4. Place wet items in a manner to allow air drying. |

| | | | |
|---|---|---|---|
| | Transportation equipment: forklifts, hand trucks, and pallet jacks. | Wash, rinse, and sanitize:<br>1. Before each use.<br>2. Any time contamination occurs or is suspected | 1. Spray with cleaner.<br>2. Wipe down with a towel.<br>3. Spray with sanitizer.<br>5. Allow drying. |
| Weekly | Floors and surfaces | Deep cleaning and sanitizing | 1. Sweep floors and remove all large debris.<br>2. Mop with sanitizing solution. |
| | Toilet. | | 1. Clean and scrub with detergent and a brush to remove all dirt, stains and rubbish.<br>2. Clean the wall tiles.<br>3. Rinse with clean water.<br>4. Sanitize toilets with a sanitizing solution. |
| Monthly | Drains | Clean and sanitize. | 1. Effective removal of soil and rinse step.<br>2. Application of sanitizing agent.<br>3. Remove all large debris before moving the protection.<br>4. Make sure the area around the drain is clean.<br>5. Clean with a garden hose and hot water.<br>6. Remove protection and spray with detergent on both sides and inside the drain.<br>7. Deep scrub all edges, corners with an appropriate scouring pad or brush.<br>8. Rinse with clear water.<br>9. Allow 90 sec.<br>10. Spray sanitizer inside the drain and both sides of protection.<br>11. In a cleaning bucket, mix one gall of water with 1 cup of bleach and pour it into the drain. |

RESPONSIBILITIES

1. Cleaning food contact surfaces and equipment is the responsibility of individuals using the equipment.

2. The person in charge or designated alternate will review direct food contact surfaces and non-food contact surfaces to ensure that they have been properly cleaned and sanitized.

MONITORING

Designated employees will:

1. Complete the SSOP-R-ES End of Shift Cleaning record daily at the end of every shift.
2. Check invoices or packaging slips at receiving before chemicals are stored in the food-grade chemical storage area.
3. Record the sanitizer concentration in the SSOP-R-PO Pre-Operation record.

Person in charge will:

1. During all hours of operation, visually and physically inspect food contact surfaces of equipment and utensils to ensure that the surfaces are clean.
2. Inspects chemical storage, processing, and packaging areas daily before production begins to detect improper handling or storage of chemicals.
3. Test the sanitizer concentration by using the appropriate test kit.
4. If using a 3-compartment sink:
    a. Visually monitor to ensure the water in each compartment is clean.
    b. Take the water temperature in the first compartment.
    c. Test the chemical sanitizer concentration by using an appropriate test kit, i.e. test strips or equivalent.
    d. If using hot water to sanitize, use a calibrated thermometer to measure the water temperature.

CORRECTIVE ACTIONS

1. Retrain any employee found not following the procedures in this SOP.
2. Wash, rinse, and sanitize dirty food contact surfaces. Sanitize food contact surfaces if it is discovered that the surfaces were not properly sanitized. Discard food that comes in contact with food contact surfaces that have not been sanitized properly.
3. In a 3-compartment sink:
    a. Drain and refill compartments periodically and as needed to keep the water clean.
    b. Adjust the water temperature by adding hot water until the desired temperature is reached.
    c. Add more sanitizer or water, as appropriate, until the proper concentration is achieved.
4. Unapproved chemicals are returned or used in non-processing areas.

5. Improperly stored chemicals are moved to the correct storage area.
6. The person in charge initiates the correction of any potentially contaminating condition.

VERIFICATION AND RECORD-KEEPING

The HACCP coordinator will review direct food contact surfaces to ensure they have been properly sanitized and will check the SSOP-R-PO Pre-Operation, and SSOP-R-ES End of the shift, while conducting the monthly HACCP audit. Findings must be recorded in the SOP-R-MA Monthly HACCP Audit record. All records shall be maintained for a minimum of 2 years.

## SSOP-D-PI Pre-operation inspection

PURPOSE AND INTRODUCTION

Ensure that the facility is clean before starting activities.

CRITERIA AND INSTRUCTIONS

The person in charge or designated alternate will visually inspect the production areas and complete the SSOP-R-PO Pre-Operation record to ensure cleanliness and organization.

RESPONSIBILITIES

The person in charge or designated alternate will review the pre-operation activities that are performed.

MONITORING

The inspection considers the following:

1. There are no signs of pests in the receiving, storage, and production areas.
2. Chemicals are properly stored and labeled.
3. Floors, walls, windows, and ceilings are clean and in good repair throughout the production areas.
4. There are no glass fragments.
5. All areas and hallways are clean and organized.
6. Hairnets are available.
7. Packaging materials are properly stored.
8. The three-compartment sink is clean, the sanitizer is in the correct concentration (Review manufacturer instructions).
9. All food utensils were washed rinsed and sanitized and are in place.
10. All equipment and direct food contact surfaces are clean.
11. Handwashing stations provide warm water, are clean, and all the dispensers are full.

12. Employees appear in good health and have no open sores, or cuts, on their hands or fingers.
13. Employees are not wearing jewelry, except for wedding bands and they store their belongings in a designated area.
14. Employees are wearing clean clothes.
15. Employees properly wash their hands before starting activities.

RESPONSIBILITIES

The person in charge or designated alternate will review the pre-operation activities are performed.

CORRECTIVE ACTIONS

1. If any area or equipment is not properly cleaned and sanitized, the area and/or equipment must be recleaned and sanitized before production starts.
2. If any food product was contaminated, it must be discarded.
3. The person in charge initiates the correction of any potentially contaminating condition and reevaluates and modifies the sanitation SOPs to improve the execution of the procedures.
4. Reported damages or malfunctions must be corrected. The person in charge will contact the proper contractor to fix the problem.

VERIFICATION AND RECORD-KEEPING

Once per month during the monthly HACCP audit, the HACCP coordinator will review the facility to ensure that it is clean and will check the SSOP-R-PO Pre-Operation record. The record shall be maintained by the establishment for no less than 2 years.

## SSOP-D-FM Foreign material control program

PURPOSE AND INTRODUCTION

The purpose of the program is to define the potential foreign material objects and reduce the physical hazard.

A physical hazard in food is any foreign material or extraneous object that may cause illness or injury to the customer if not properly controlled. The types of foreign materials could include pieces of metal, plastic, ceramics, and glass. The size of these pieces could be variable, but only those with less than 7 mm rarely cause serious injury, except in special risk groups such as infants, surgery patients, and the elderly.

CRITERIA AND INSTRUCTIONS

Dupont Street Imports LLC is committed to reducing, and where possible eliminating the potential of glass, metal, brittle, hard plastic contamination, and physical hazards in the products, which are being handled at the production and storage areas.

## Physical Hazards

1. The product cannot contain a hard or sharp foreign object that measures 7 mm to 25 mm, in length.
2. The main risks for physical hazards come from:
    a. Contamination from the producer is addressed by the requirement for an Approved Supplier.
    b. Metal and other contamination from equipment are addressed by regular cleaning and maintenance of the equipment.

## Policy and control measures:

| Material | Main source | Policy and measures to prevent plastic contamination are: |
|---|---|---|
| **Plastic** | Ingredient containers | 1. No broken plastic bags or containers are allowed in the production, storage, and packaging rooms.<br>2. Plastic jewelry and plastic wristwatches are not permitted in production and storage areas. The exclusion of these items is checked during pre-operational inspections and monthly audits.<br>3. All the plastic containers and plastic covers are inspected when received and used in the production area. |
| **Glass** | Packaging materials, ceiling light bulbs, and windows, which can be broken during building maintenance | 1. All glass packaging material is inspected when received and used in the packaging area.<br>2. Glass, brittle plastics, or ceramic should not be used in areas where the possibility of the contamination may exist, except where necessary or where removal is immediately feasible.<br>3. No glass, brittle plastics, or ceramics will be brought in with personal effects.<br>4. During the pre-operative inspection, the person in charge will inspect the production area for any source of fragments of glass and take the necessary measures to avoid product contamination.<br>5. If fragments of glass are detected in the production area, do not start operations and locate and correct the source of the glass fragments. If fragments of glass are detected in the |

| | | |
|---|---|---|
| | | production area during the shift, stop operations, and locate and correct the source of the glass fragments. |
| **Metal** | Utensils, containers, and equipment present in the production area | 1. Metal utensils used in processing and packaging operations are controlled, kept clean, and well-maintained. All utensils with defects are repaired before being used or replaced.<br>2. Equipment made of metal will be well maintained and inspected to prevent the presence of loose nuts and bolts.<br>3. Non-production equipment and maintenance tools would not be left in the processing and storage areas and will have designated storage space.<br>4. Every time the maintenance tools are used, the area must be cleaned and inspected to ensure there are no foreign materials left in the area.<br>5. Jewelry and metal wristwatches are not permitted in production, storage, and packaging areas. The exclusion of these items is checked during pre-operational inspections and monthly audits.<br>6. Regular cleaning and maintenance of the equipment.is performed. |
| **Wood** | Pallets located in the receiving/storage area | 1. Wooden pallets must be in good condition and clean.<br>2. Wooden pallets are not allowed in the processing area.<br>3. Wooden utensils should be in good repair (boards/tables/rolling pins /utensils and all other wood have no cracks, scrapes, or any potential hazards), and broken or damaged utensils should be discarded.<br>4. The condition of wooden pallets and utensils is checked during the pre-operational inspection and the monthly audit. |

**Management of glass or hard plastic incidents**

To prevent broken glass or other brittle material from entering the production area and contaminating food products. Always check packaging materials and the pallet that they are on before they are used. If any packaging material breaks or is found broken during packaging or sanitizing procedures:

1. Immediately stop activities and locate the broken glass or brittle material may be.
2. Set up cones to redirect traffic away from the affected area. (A radius of 50 ft must be quarantined if there is an overhead glass breakage, 15 ft when tending to a ground-level glass breakage).
3. Prevent another employee from coming into the area.

4. Use cut-resistant gloves to pick up all large and small fragments of glass and brittle material.
5. Grab a broom to sweep up any additional glass pieces.
6. Employees nearby may need to change clothes.
7. Rinse down the floor using water. Use a vacuum if available to get up small pieces.
8. Discard any product that was or may have been contaminated (When in doubt throw it out).
9. Discard the glass fragments and any brittle material pieces immediately into the broken glass receptacle.
10. Wash down all cleaning utensils and shoes that may have come in contact with the glass immediately after clean up and away from production.
11. Inspect the area carefully before allowing activities to continue.
12. Record the incident in the SOP-R-DR Deviation Report and indicate how it occurs, a detailed description of the corrective actions, the place it occurred, and the product being produced with lot codes.

**Management of metal fragments incidents**

If equipment is found to be missing a part, such as a screw, bolt, rubber gasket, or any other part:

1. Immediately shut down your production lines for re-inspection.
2. Discard any product that was or may have been contaminated (When in doubt throw it out).
3. Analyze the equipment's last inspection and determine how much, if any, of the product manufactured during that time has been contaminated.
4. Clean and sanitize the equipment.
5. Inspect the area carefully before allowing activities to continue.
6. Record the incident in the SOP-R-DR Deviation Report and indicate how it occurs, a detailed description of the corrective actions, the place it occurred, and the product being produced with lot codes.

RESPONSIBILITIES

1. All employees are responsible for the correct management of materials to avoid contamination of the products.
2. The HACCP coordinator is responsible for implementing measures to control foreign materials.

MONITORING

Once the inventory is established, it should be used to conduct routine audits of the essential glass and brittle plastic. It is suggested that all items be inspected at least weekly. More frequent inspections may be appropriate for items that are in direct contact with the product or in product zones.

CORRECTIVE ACTIONS

1. The main purpose of the inventory is for inspection. Once an item is identified as damaged or missing, corrective action must be implemented and documented.
2. The finding may be something as simple as a missing end cap over a light tube, or it may be evidence that broken glass may have entered the product stream.
3. It will be the responsibility of the HACCP coordinator to determine the appropriate corrective action and to recommend and implement any preventive measures.

VERIFICATION AND RECORD KEEPING

During the monthly HACCP audit, the HACCP coordinator will review the SOP-R-DR Deviation Report. Records shall be maintained by the establishment for no less than 2 years.

## SSOP-D-PC Pest control

PURPOSE AND INTRODUCTION

The purpose of this SOP is to outline the activities that the establishment must follow to prevent access, deny harbourage and eradicate any pest infestation.

INSTRUCTIONS

1. A pest management firm inspects the outside and interior areas of the building and treats them as necessary with appropriate chemicals and traps weekly
2. Facility grounds and interior areas are kept free of litter, waste, and other conditions that might attract pests.
3. Outer facility doors are kept closed.
4. No pets are allowed in the facility.
5. Supervisors and workers report any pest problems to the person in charge.

FREQUENCY

The pest management firm's evaluation will be weekly. Verification that there are no pests or signs of pests in the facility should be done daily.

MONITORING

The HACCP coordinator reviews reports of pest treatment. The person in charge inspects the facility daily and reports any deviations in the SSOP-R-PO Pre-Operation record.

CORRECTIVE ACTION

The person in charge reviews reports of pest treatment. The person in charge inspects the facility's interior daily.

1. The pest management firm is notified of any pest problem and authorized to treat the problem.
2. Eradication measures shall be put in place immediately by the pest management firm after evidence of infestation is reported.
3. Pest treatments are more frequent if problems are identified.

VERIFICATION AND RECORD-KEEPING

The person in charge reviews pest control reports and inspects the facility's interior daily before production starts. Facility inspections and corrective actions are noted on the SSOP-R-PO Pre-Operation record. Reports of pest treatment are recorded and maintained for at least two years.

## SSOP-D-MP Maintenance program

PURPOSE AND INTRODUCTION

The purpose of this SSOP is to outline best practices for communicating needs and requests related to facility and vehicle maintenance.

CRITERIA AND INSTRUCTIONS

1. The equipment and facility maintenance activities are reported in the SSOP-R-FE Facility and Equipment Maintenance record.
2. The vehicle maintenance activities are reported in the SSOP-R-VM Vehicle Maintenance Program record.

| **Maintenance activities** | | |
|---|---|---|
| Item / Area | Frequency | Activity |
| Equipment | As required | 1. Maintenance periodically.<br>2. An external contractor provides this service. |
| Facility | As required | 1. Any damage or malfunction in the facility must be reported immediately. |

| | | |
|---|---|---|
| | | 2. Being as descriptive as possible and including photos that allow the problem to be addressed efficiently.<br>3. The person in charge will alert the HACCP coordinator who will contact the service providers to schedule repairs as appropriate. |
| Vehicle | Weekly | 1. Any damage or malfunction in the vehicle should be immediately reported.<br>2. Being as descriptive as possible and including photos that allow addressing the issue efficiently. |

RESPONSIBILITIES

1. All employees are responsible for reporting failures or repair needs.
2. The HACCP coordinator is responsible for scheduling repairs and maintenance of equipment and facilities on time.

MONITORING

The HACCP coordinator will supervise activities to ensure that proper maintenance occurs most efficiently.

CORRECTIVE ACTIONS

If maintenance or repairs do not occur as planned, the HACCP coordinator or designated employee should follow up with service providers to complete activities immediately.

VERIFICATION AND RECORD-KEEPING

The HACCP coordinator will review equipment to ensure that it has been in good condition and will check the SSOP-R-EM Equipment Maintenance record and SSOP-R-VM Vehicle Maintenance Program record while performing the monthly HACCP audit. All records shall be maintained for a minimum of 2 years.

## SSOP-D-EM Environmental monitoring

PURPOSE AND INTRODUCTION

Environmental monitoring is recommended for the prevention of foodborne illnesses, quality control, and compliance with FDA regulations.

To ensure proper monitoring, Dupont Street Imports LLC performs an ATP swab test, a test that is based on the measurement of ATP in all organic matter and microorganisms, where it is possible to provide an objective assessment of cleaning equipment and surfaces before processing or preparing food.

CRITERIA AND INSTRUCTIONS

Samples will be taken using aseptic techniques. Production areas are required to perform testing randomly on the following surfaces: tables, equipment, filler, scales, walls, floors, utensils, tools, racks, sinks, and drains.

1. ATP – Adenosine Triphosphate, is an organic molecule that is used by living cells as the main source of energy. The presence of ATP on a surface indicates that the surface has not been adequately cleaned and has the potential to harbor and support bacterial growth.
2. Luminometer – detects ATP using a chemical reaction (ATP bioluminescence)
3. Luciferin / Luciferase + ATP = Light
4. The luminometer detects total ATP, not just ATP from bacteria, yeast, and mold but also the ATP from any organics in the sample.
5. RLU – Relative Light unit – The luminometer displays results in RLU values. The light produced from the Luciferin/Luciferase and ATP reaction in the swab is emitted in the form of photons.

Sample Collection

1. When collecting a sample, make sure to use aseptic techniques. Do not touch the swab or the inside of the sampling device with your fingers.
    a. Prior to use, samplers must be warmed to room temperature for at least one hour.
    b. Hold the swab tube, twist, and pull the top of the swab out of the swab tube. The swab tip comes pre-moistened with a detergent.
    c. Thoroughly swab a standard 10 x 10 cm (4 x 4 inches) area of interest for a typical flat surface. Sample the area by “drawing” a 4" X 4" square and then with a back-and-forth motion within the square.
    d. Rotate the swab while swabbing a surface. For irregular surfaces, ensure the swabbing technique remains consistent for each swab.
    e. Hold the sampler vertically and fully depress back in the swab tube to activate. Note: The sampler must be held vertically.
    f. Mix for two seconds while keeping the sampler vertical.
    g. Press the eject button and insert the sampler into the instrument.
    h. The RLU score will display along with a symbol for a pass, marginal, or fail.

2. Reading Results
    a. Depress the sampler all the way down and close the door.
    b. The RLU score will display along with a symbol for pass, marginal, or fail.

c. On the results screen, users have the option to enter notes for that result, retest that site, or move to the next site in their plan.\
d. The results screen for scheduled tests will display:
    i. Result
    ii. User
    iii. Date/Time
    iv. Plan (if applicable)
    v. Area
    vi. Group
    vii. Site
    viii. RLU

3. ATP Calibration
    a. To be performed at a minimum, annually.

FREQUENCY

Swabs are to be performed monthly.

MONITORING

1. Take 5 samples of food contact surfaces every month.
2. Samples should be collected at random, to ensure that all FCS has an equal probability of being sampled.
3. All results will be recorded in the SOP-R-AM ATP Monitoring record.

CORRECTIVE ACTIONS

1. If a Test Result FAILED:
    a. Re-Clean the machine or area.
    b. Revision of the cleaning procedure must be done.
    c. Repeat the Swab Test.
    d. Repeat Machine Calibration.
2. If a Test Result PASSED:
    a. Document the Cleaning procedure for its effectiveness.

VERIFICATION AND RECORD-KEEPING

1. Person in charge or designated alternate will review swabbing results.
2. HACCP Coordinator will review the records that are maintained.

3. Records shall be maintained by the establishment for at least 2 years Off-site storage of records is permitted after six months, if such records can be retrieved and provided, on-site, within 24 hours of an FDA employee's request.

# PL-D-SOP Standard Operating Procedures

## SOP-D-HH Personnel - health and hygiene requirements

PURPOSE AND INTRODUCTION

The purpose of this SOP is to describe the health and hygiene policy that shall be followed by all employees.

**POLICY:**

Dupont Street Imports LLC is committed to ensuring the health, safety, and well-being of our employees and customers and complying with all health department regulations.

CRITERIA AND INSTRUCTIONS

<table>
<tr><th colspan="4">Illness reports.</th></tr>
<tr><td colspan="4">All employees in direct contact with equipment, utensils, food, and packaging materials, including the janitorial crew, should inform if they:</td></tr>
<tr>
<td>Are experiencing any of the following symptoms:<br>a. Diarrhea.<br>b. Vomiting.<br>c. Jaundice.<br>d. Sore throat with fever.</td>
<td>Are diagnosed by a healthcare provider as being ill with any of the following diseases:<br>a. Salmonella typhi.<br>b. Salmonella non-typhoidal.<br>c. Shigellosis.<br>d. Escherichia coli.<br>e. Hepatitis A virus.<br>f. Norovirus.</td>
<td>If they have been exposed to the following high-risk conditions:<br>a. Exposure to or suspicion of causing any confirmed outbreak involving any of the illnesses mentioned.<br>b. A member of their household is diagnosed, attending, or working in a setting with any of the illnesses mentioned.</td>
<td>Present any injury:<br>a. Wounds on the hands or wrists, or portions of arms, unless an impermeable cover such as a finger cot or stall protects the wound and a single-use glove is worn over the impermeable cover.<br>b. Wounds on other parts of the body, unless the wound is covered by a dry, durable, tight-fitting bandage.</td>
</tr>
</table>

**Managing employee health**

Employees experiencing, while at work in a food facility, persistent sneezing, coughing, or runny nose that is associated with discharges from the eyes, nose, or mouth, and that cannot be controlled by medication, shall not work with exposed food; clean equipment, utensils, or unwrapped single-use utensils.

Anyone who has come into contact with any of the reportable illnesses or symptoms must be excluded from work until cleared by a physician.

<table>
<tr><th colspan="3">Personal cleanliness and hygienic practices</th></tr>
<tr><td rowspan="3">Handwashing practices</td><td>When</td><td>1. Before:<br>a. Engaging in daily activities (including working with non-prepackaged food, clean equipment and utensils, and unwrapped single-use food containers and utensils)<br>2. After:<br>a. Touching bare human body parts other than clean hands and clean, exposed portions of arms.<br>b. Using the toilet/restroom facilities.<br>c. Coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating, or drinking.<br>d. Handling soiled equipment or utensils.<br>e. Engaging in other activities that contaminate the hands.</td></tr>
<tr><td>Where</td><td>1. Employees shall use designated hand sinks for handwashing only and stocked with soap, disposable towels, warm water, and a garbage can.<br>2. Food preparation, utility, and dishwashing sinks shall not be used for handwashing.</td></tr>
<tr><td>Procedure</td><td>1. Rinse under clean, running-warm water.<br>2. Apply cleaning compound.<br>3. Rub together vigorously.<br>4. Thoroughly rinse under clean, running warm water<br>5. Dry with disposable paper towels.</td></tr>
<tr><td>Fingernails</td><td colspan="2">1. Employees shall keep their fingernails trimmed, filed, and maintained so the edges and surfaces are cleanable and not rough.<br>2. False or polished nails are only allowed when covered by a single-use glove at all times when working with food.</td></tr>
<tr><td>Jewelry</td><td colspan="2">1. The use of bracelets and watches is prohibited while handling food.<br>2. Jewelry is limited to a plain ring, such as a wedding band.</td></tr>
</table>

| | |
|---|---|
| **Dress code** | Wear:<br>1. Hair restraints such as hair coverings or nets.<br>2. Clean outer clothing and/or uniforms.<br>3. Single-use gloves when required. |
| **Eating and drinking** | 1. Employees shall eat, drink, or use any form of tobacco only in designated areas.<br>2. Employees may drink from a closed beverage container.<br>3. Personal food must be separated from other food and packaging. |
| **Employees practices** | 1. Follow all health and hygiene policies and procedures of the company.<br>2. Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.<br>3. Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.<br>4. Minimize bare-hand and arm contact with non-prepackaged food that is in a ready-to-drink form.<br>5. No employee shall commit any act that may cause the contamination or adulteration of food, food-contact surfaces, or utensils. |

FREQUENCY

The health and hygiene policy shall be followed by all the employees every workday.

RESPONSIBILITIES

All employees are responsible for adhering to proper health and hygiene practices to prevent contamination. Proper training should be provided to each employee. The person in charge is responsible for overseeing, reporting, and correcting health and hygiene practices.

MONITORING

1. The person in charge or designated alternate shall monitor activities performed by the trained employees during a shift.
2. The person in charge or designated alternate shall monitor handwashing by observing and correcting improper handwashing throughout the shift.
3. The person in charge or designated alternate shall also observe team members for symptoms. Team members exhibiting symptoms shall be excluded from working with food, clean utensils, and clean equipment.

CORRECTIVE ACTIONS

If employees are observed improperly washing hands or exhibit symptoms of illness:

1. The person in charge or a designated alternate will be immediately notified.

2. Any product that was handled by employees that do not wash their hands properly shall be discarded.
3. Food products handled by employees with active symptoms or reported symptoms shall be discarded.
4. The person in charge or designated alternate shall stop and immediately correct hand-washing mistakes.
5. Employees that show active symptoms or self-report symptoms and conditions shall be excluded from working with exposed food, clean utensils, linens, and equipment.
6. Any employees exhibiting inconsistent hand-washing practices or neglect to self-report illness after retraining shall be documented and disciplined following company policies.

VERIFICATION AND RECORD-KEEPING

The HACCP coordinator will directly observe trained employees in the middle of a shift while conducting monthly HACCP audits. Findings should be recorded in the SOP-R-MA Monthly HACCP Audit record. All records will be kept for a minimum of 2 years.

## SOP-D-PHCC Product handling requirements and prevention of cross-contamination

PURPOSE AND INTRODUCTION

All employees involved in handling food must follow proper handling procedures during all steps/processes to prevent contamination.

CRITERIA AND INSTRUCTIONS

Product handling by operators shall adhere to the following:

1. Food shall be prepared with suitable utensils and on surfaces that, before use, have been cleaned, rinsed, and sanitized to prevent cross-contamination.
2. Unless a utensil used to taste the food is discarded after the first time it is used for this purpose and before the next tasting or any other use, the utensil shall be washed, rinsed, and sanitized.

**Cross-contamination.**

1. Non-compatibles activities. Due to the risk of cross-contamination, the following activities are non-compatibles, and measures to keep the activities separated should be taken:

a. Cleaning and processing activities: activities cannot occur at the same time. Ingredients and packaging materials must be immediately removed from the processing room and properly stored before any cleaning activity is performed.
b. Before entering the production areas, employees must store their belongings in designated areas, wear clean clothes, restrain their hair, and wash their hands.

MONITORING

The person in charge or designated alternate shall oversee proper product handling throughout the day.

CORRECTIVE ACTIONS

If employees are observed improperly handling food:

1. The person in charge or a designated alternate will be immediately notified.
2. Any product that was improperly handled by employees must be discarded.
3. The person in charge or designated alternate shall retrain employees observed not properly handling food.
4. Any employees exhibiting inconsistent food handling practices after retraining shall be documented and disciplined following the established personnel policies.

VERIFICATION AND RECORD-KEEPING

The person in charge will observe the trained employees during a shift while performing a monthly HACCP audit. Findings must be recorded on the SOP-R-MA Monthly HACCP Audit record. All records shall be maintained for a minimum of 2 years.

## SOP-D-AC Allergen control requirements

PURPOSE AND INTRODUCTION

The objective of this procedure is to control allergens present in the facility and prevent cross-contact with non-allergenic products. The main food allergens are milk, eggs, wheat, soybeans, fish, crustaceans, peanuts, sesame, and tree nuts. Products on this HACCP plan DO NOT contain any of the main food allergens.

CRITERIA AND INSTRUCTIONS

**Receiving and storage**

1. When receiving, all the labels of ingredients shall be examined to determine if there are any that contain allergens.

**Employee practices**

1. Allergens that come from employee food (fish, wheat, soy, nuts, dairy, eggs) should not leave the lunchroom. Food is not allowed in the work area.
2. All employees are trained with the allergen management system.

MONITORING

The person in charge or designated alternate shall oversee proper allergen control procedures during production activities.

CORRECTIVE ACTIONS

If any of the allergen control procedures have not been properly followed:

1. Retrain any employee found not following the procedures in this SOP.
2. When an accidental allergen spill occurs, the person in charge is immediately notified and they decide on the use of the affected ingredients/products.

VERIFICATION AND RECORD-KEEPING

The person in charge or designated alternate will check for adherence to allergen control procedures.

## SOP-D-GS General storage

PURPOSE AND INTRODUCTION

This SOP outlines the enhanced food safety procedures to be used to reduce product risk and the associated threat of foodborne illness during the storage of goods.

CRITERIA AND INSTRUCTIONS

**General considerations**

1. Maintain clean and uncluttered storage areas.
2. Keep all food items on shelves that are at least 6” above the floor and 2-inches from the wall to facilitate air circulation and proper cleaning. Do not store foods directly on the floor.
3. Make sure items are dated with receiving date and/or use-by date.
4. Store food in the original container if the container is clean, dry, and intact. If necessary, repackage food in clean, well-labeled, airtight containers.
5. Food is NEVER put in chemical containers and chemicals are NEVER placed in food storage containers.

**The FIFO rule**

1. After being received, all ingredients must be stored following the FIFO rule (First-IN, First-OUT). It is a basic rule of product rotation that protects product quality and freshness. Products with the earliest use-by or expiration dates are stored in front of products with later dates to minimize spoilage and waste.
2. No food, boxes, or containers can be stored on the floor.
3. All food must be labeled and covered all the time.

**Dry storage**

1. Should be dry, cool, well-ventilated, clean, and free from insects and rodents.
2. Opened ingredients should be stored in sealed, airtight containers.
3. Bagged items should be cross stacked for ventilation.

FREQUENCY

Proper storage of goods is daily followed and verified by the HACCP coordinator during the monthly audit.

RESPONSIBILITIES

The trained employee receiving the ingredients and materials is responsible for the proper storage of the items. All employees are responsible for the proper storage of products in their daily activities and reporting any deviation to the person in charge.

MONITORING

1. Do a visual check of the ingredients and product labels to make sure no expired products are stored.
2. Inspect the dry storage area during pre-operation inspection activities and record observations in SSOP-R-PO Pre-Operation.
3. Temperature logs will be reviewed by the person in charge to make sure there are no temperature deviations and necessary corrective action was taken.

CORRECTIVE ACTIONS

1. If expired or damaged products are found under storage, they must be immediately discarded.
2. Re-train any employee found not following the procedures in this SOP.

VERIFICATION AND RECORD-KEEPING

The HACCP coordinator checks for adherence to SOP-D-GS General storage procedures and completes SSOP-R-PO Pre-Operation, and the SOP-R-DP Discarded Products record while performing monthly HACCP audit. If a deviation occurs, the event and corrective actions must be recorded in the SOP-R-DR Deviation Report. All records are maintained for a minimum of 2 years.

## SOP-D-PR Production

PURPOSE AND INTRODUCTION

The person in charge should visually verify the production activities and associated records.

CRITERIA AND INSTRUCTIONS

1. Prepare the ingredients:
    a. Combine extracts and the rest of the ingredients.
    b. Dilute ingredients with water and sugar in 550-gallon containers.
2. Move to the circulation tank to mix evenly.
3. Measure and adjust the pH of the mixture. pH must be ≤3.30
    a. Please, view **CCP1 pH testing** for more specifications.
4. Pressurize the product with $CO_2$ in chosen manner:
    a. Filter the mixture into a clean, deaerated tank with a 0.45-micron press.
    b. Deaerate with nitrogen and carbonate with carbon dioxide using a high-pressure circulation method that uses an in-line carbonation machine, hoses, and pumps.
5. Measure alcohol concentration. Alcohol content of the product must be ≤ 0.5%.
    a. Please, view **CCP 2 Alcohol volume reading** for more specifications.
6. Product filling:
    a. Place the bottles on conveyors to enter the production monoblock.
    b. Rinse the bottles with a phosphoric acid solution.
    c. Aspirate to remove oxygen.
    d. Insert with counter pressure in the form of carbon dioxide and immediately fill and cap.
    e. Dry the bottles and pack them.
7. The finished product is labeled.
    a. Follow REC-D-LT Labeling and Traceability SOP specifications

10. Move to dry storage

MONITORING

The designated employees will register the production steps in the CCP-R-PR Production Record.

CORRECTIVE ACTIONS

Discard the product that is not properly prepared if it is not possible to correct the formulation.

VERIFICATION AND RECORD-KEEPING

The person in charge or designated alternate will observe the employee performing production monitoring activities and will review the CCP-R-PR Production Record specifications while performing monthly HACCP audits. All records are maintained for a minimum of 2 years.

## SOP-D-PH pH Meter calibration

PURPOSE AND INTRODUCTION

Calibration for the pH Meter is important for the correct measurement of the process, and the correct functionality of the equipment.

CRITERIA AND INSTRUCTIONS

1. Examine the pH meter for damage, as well as the electrode for scratches or cracks that may affect performance.
2. Begin by rinsing the electrode in distilled water to remove any salt crystals or other impurities. Use either a rinse bottle or by filling a beaker with distilled water, stirring the electrode gently in the distilled water for 4-6 seconds.
3. After rinsing, shake the electrode to remove any excess water as well as to remove any entrapped air bubbles inside.
4. Prepare the single-use packets of pH buffer solutions 4.0 and 7.0 to perform the two-point calibration.
5. Place the electrode in your first calibration solution, taking care to fully submerge the sensing tip and junction and stir gently.
6. While gently stirring the electrode in the pH buffer, wait for the meter reading to stabilize for at least 3 seconds and confirm the calibration. Rinse the electrode and repeat this process using the second calibration solution.
7. The pH meter is now ready to begin taking measurements.
8. pH meter should be calibrated before use, at least once a week.

FREQUENCY
1 per day, if a pH Meter is going to be used.

RESPONSIBILITIES
The person in charge or designated alternate is responsible for ensuring that the pH Meter maintains a valid calibration.

MONITORING
The person in charge or designated alternate shall perform pH meter calibrations and record the calibration events in the SOP-R-PH PH Meter Calibration record.

CORRECTIVE ACTIONS
1. pH Meters that fail the calibration process must either be discarded or sent to the manufacturer for repair.
2. Damaged pH meters must be removed from service and replaced.

VERIFICATION AND RECORD-KEEPING
The HACCP coordinator will check to ensure adherence to pH meter calibration procedures and SOP-R-PH PH Meter Calibration records while performing the monthly HACCP audit. All records are maintained for a minimum of 2 years.

## SOP-D-FPRS Finished product release and shipping.

PURPOSE AND INTRODUCTION
Finished goods must be approved by the person in charge or the HACCP coordinator before shipment.

Finished goods will be shipped in a manner that avoids food contamination and ensures food safety.

CRITERIA AND INSTRUCTIONS
Before shipping
1. Person in charge and/or HACCP coordinator are responsible for:
    a. Approving the shipment of finished products and releasing hold or quarantined product
    b. Reviews the Batch file. Batch files include:

   i. Receiving records.
   ii. Production records.
2. Finished product, product on hold, or quarantined undergo review before release to ensure all inspections and analyses have been successfully carried out (when applicable).
3. If all records are complete and all inspections and analyses have been completed (when applicable) and documented, and safety controls are met, the reviewer signs the SOP-R-PS Pre-Shipment Review record as a record of release and verification of monitoring activities.

Products shall be transported in a manner that meets the following requirements:

1. The products must have a clean and not broken or damaged package, and also must be strong enough to withstand the transport.
2. During transportation, food, food-contact surfaces, and utensils shall be protected from contamination.
3. Receptacles in vehicles and/or containers must not be used for transporting anything other than foodstuffs where this may result in contamination of foodstuffs.

FREQUENCY

This SOP will be followed every time an item is shipped.

MONITORING

The person in charge and/or HACCP coordinator will complete an SOP-R-PS Pre-Shipment Review record describing the truck and food conditions to ensure that the food is transported under adequate control every time shipping occurs.

CORRECTIVE ACTIONS

If it is aware of an indication of a possible material failure or other conditions that may render the food unsafe during transportation:

1. The Person in charge and/or HACCP coordinator will be immediately notified.
2. Any product that was improperly handled during transportation must be discarded.
3. In case of observing any indication of cross-contamination, the product must be immediately discarded.

VERIFICATION AND RECORD-KEEPING

Person in charge or designated alternate checks for adherence to shipping procedures and for completing SOP-R-SR Pre-Shipment Review records while performing monthly HACCP

audit. If a deviation occurs, the event and corrective actions must be recorded in an SOP-R-DR Deviation Report. All records are maintained for a minimum of 2 years.

## SOP-D-TD Training and documentation

PURPOSE AND INTRODUCTION

To reduce foodborne illness through the employee's education and knowledge.

CRITERIA AND INSTRUCTIONS

Employees will be trained and tested in many critical areas of food handling including but not limited to:

| **Training course list** | | | | | |
|---|---|---|---|---|---|
| Course | Training for | | | | |
| | Supervisor | Person in charge | Employees preparing food items | Designated employees (as per their role) * | Recall team |
| **HACCP Plan** | | | | | |
| Food processing hazards | ✓ | ✓ | ✓ | | |
| Food defense plan | ✓ | ✓ | ✓ | ✓ | |
| **Supply Chain Preventive Controls** | | | | | |
| Receiving | ✓ | ✓ | | ✓ | |
| Approved supplier program | ✓ | ✓ | | ✓ | |
| **Sanitation Preventive controls** | | | | | |
| Cleaning and sanitizing of food contact surfaces and equipment | ✓ | ✓ | ✓ | ✓ | |
| Pre-operation inspection | ✓ | ✓ | ✓ | ✓ | |
| Foreign material control program | ✓ | ✓ | ✓ | ✓ | |
| Pest control | ✓ | ✓ | ✓ | ✓ | |
| Maintenance program | ✓ | ✓ | ✓ | ✓ | |
| Environmental monitoring | | ✓ | ✓ | ✓ | |
| **Standard Operating Procedures** | | | | | |
| Personnel health and hygiene requirements | ✓ | ✓ | ✓ | | |
| Product handling requirements and prevention of cross-contamination | ✓ | ✓ | ✓ | | |

| | | | | | |
|---|---|---|---|---|---|
| Allergen control requirements | ✓ | ✓ | ✓ | ✓ | |
| Production | ✓ | ✓ | ✓ | ✓ | |
| pH Meter calibration | ✓ | ✓ | ✓ | ✓ | |
| General storage | ✓ | ✓ | ✓ | | |
| Finished product release and shipping | ✓ | ✓ | | ✓ | |
| **Traceability and Recall** | | | | | |
| Labeling and traceability | ✓ | ✓ | | | ✓ |
| Recall | ✓ | ✓ | | | ✓ |
| Mock recall | ✓ | ✓ | | | ✓ |
| **Critical Control Points** | | | | | |
| CCP 1: pH testing | ✓ | ✓ | ✓ | | |
| CCP 2: CCP2 Alcohol volume reading | ✓ | ✓ | ✓ | | |

INSTRUCTIONS

All staff will be trained in these areas and will need to sign off on Dupont Street Imports LLC food handling sign-off as well as the illness reporting policy.

MONITORING

1. Employees will not be allowed to begin training for work until a manager has received the illness reporting policy. This will be signed at the time of employee hire.
2. Employees will not be allowed to work unsupervised until all food handling has been discussed and training complete.
3. The person in charge will approve work once all training covering principles and/or components of this HACCP plan is complete.
4. Each person trained will sign off on the SOP-R-ET Employee Training and SOP-R-EC Employee Training Course List records.

CORRECTIVE ACTIONS

Any employee found not following the guidelines will be retrained and or disciplined.

VERIFICATION AND RECORD-KEEPING

Person in charge ensures the training of all employees and checks for completing SOP-R-ET Employee Training and SOP-R-EC Employee Training Course List records. All records are maintained for a minimum of 2 years.

# SOP-D-AR HACCP Audit requirements

PURPOSE AND INTRODUCTION

To describe the CCP verification procedures and the monthly HACCP audits.

CRITERIA AND INSTRUCTIONS

To ensure the correct implementation and monitoring of the HACCP plan, the HACCP coordinator will conduct a monthly audit of the system.

FREQUENCY

1. Once per month, the HACCP coordinator conducts a HACCP plan audit.
2. Once per week, the person in charge verifies the CCP records.

RESPONSIBILITIES

1. The person in charge verifies the CCP records once a week.
2. The HACCP coordinator conducts a HACCP audit once a month.

MONITORING

1. Once per week, the person in charge will verify and sign all CCP records produced during the week to ensure that all critical limits are being met.
2. Once per month, the person in charge will perform a HACCP plan audit, which includes a walk-through to inspect the physical premises and staff activities, and a review of all records produced since the last monthly audit.

CORRECTIVE ACTIONS

1. If deviations are discovered during the verification of records or monthly audit, the person in charge will immediately implement retraining of all affected personnel, including a training record.
2. If the frequency of the audit is not met by the person in charge, corporate senior management will be notified, and disciplinary action will be taken.

VERIFICATION AND RECORD-KEEPING

To ensure that HACCP plan verification requirements are consistently implemented, the person in charge will sign CCP records weekly and complete the monthly HACCP audit record while conducting the monthly audit. The CCP record and SOP-R-MA Monthly HACCP Audit record will be retained for 2 years for review by health inspectors and senior management.

# PL-D-REC Traceability and Recall

## REC-D-LT Labeling and traceability

PURPOSE AND INTRODUCTION

The purpose of this standard operating procedure is to describe how to label finished products to ensure food safety and traceability. Traceability is the ability to track a product one step forward and one step back.

CRITERIA AND INSTRUCTIONS

**Labeling**

For sale, products will be packaged as described in the P-D-PD Product Description section and labeled with the approved label and the production date. Labels include the following information:

1. Mandatory Features Located on the principal display panel.
    a. Product Name
    b. Name and address of the manufacturer / Establishment Number
    c. Net Weight Statement
2. Information Panel
    a. Mandatory information that is permitted to be displayed off the principal display panel
    b. Ingredients
    c. Nutrition Facts
    d. Lot code
    e. PO number
3. Mandatory Feature Displayed Anywhere on Labeling
    a. Safe Handling Instructions: “Refrigerate after opening”

At the end of the packaging and labeling activities, ensure that all material packaging and labels are properly stored.

**Traceability**

1. For traceability purposes, the receiving date or lot code of each ingredient will be written in all production records.
2. In case of a recall due to an ingredient (review REC-D-RP Recall), all the ingredients identified with the same code must be kept on hold to prevent their use until the investigation conducted determines that the ingredients are safe or must be discarded.

3. All finished products will be labeled with the lot code and PO number.
4. In case of a recall, all the finished goods described with the same production date and all the ingredients related must be recalled (review REC-D-RP Recall ) and kept on hold to prevent their use until the investigation conducted determines if the product is safe or must be discarded.

MONITORING

The person in charge will review labeling activities to ensure labels are correct and the process is occurring according to the instructions. Ensure that the product name and the production date on the label are correctly listed. The register that products are properly packaged and labeled before delivery is made in the CCP-R-PR Production Record and the SOP-R-PS Pre-Shipment Review Record.

CORRECTIVE ACTIONS

1. Discard any damaged label or packaging material.
2. Discard any incorrect labels.
3. Relabel any product that is mispackaged or mislabeled.
4. According to the production date and shelf life, products that are out of date must be discarded.

VERIFICATION AND RECORD-KEEPING:

The person in charge or designated alternate will check labels and packaging materials specifications while performing monthly HACCP audit. All records are maintained for a minimum of 2 years.

## REC-D-RR Recall

Product recall is indicated when a product could represent a health risk to the consumer. The procedures implemented should effectively remove the product from circulation to prevent its consumption. This procedure will be implemented after a customer complaint that involves a recall or after the discovery of a food safety problem.

INSTRUCTIONS

Products shall be recalled in a manner that meets the following requirements:

1. Determine the class of the recall, according to the level of hazard involved:

| Class of recall | |
|---|---|
| Type | Description |
| Class I | Involves a health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death. |
| Class II | Involves a potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food. |
| Class III | Involves a situation in which eating the food will not cause adverse health consequences. |

2. Ensure the following information:
    a. Assemble an investigation team.
    b. Identify the affected product.
    c. Conduct a thorough investigation of the problem with the affected product. That includes:
        i. Receiving procedures and incoming product quality control procedures, including storing.
        ii. Quality control over products at the time of use.
        iii. A detailed description of the methods used in the preparation and packaging of the processed product.
        iv. How the finished product is stored and shipped.
        v. Labeling of product.
    d. Determine any other product(s) that may potentially be affected.
    e. Inform Health Authorities about the recall.
    f. Proceed with the recall.
    g. Determine the nature and potential causes of the problem.
    h. Describe the corrective action taken.

**Notification of Affected Parties**

Notifications during a recall must be performed promptly and should include the appropriate regulatory agencies, product distribution chain, and consumers when necessary. Recall notices are typically used to notify regulatory agencies and those businesses in the distribution chain. Press releases are oriented to consumers but may be used to notify any affected party.

1. Regulatory Agencies should be notified at the earliest opportunity after the decision is made to conduct a recall (REC-R-RS Recall Submission to FDA record).
    a. After the initial notification, the regulatory authority should be kept updated throughout the recall process.

2. Distribution Chain contacts will be notified by a written recall notice (REC-R-RL Recall Letter).
    a. Confirm receipt of the Notice of Recall with all accounts. A copy of all account communications should be maintained and recorded on the REC-R-RN Recall Notification record.
3. Consumers should be notified by the most effective method available. If appropriate, a press release can be used to notify consumers.
    a. Issuance of a press release should be the highest priority and should be issued promptly.
    b. The local FDA District Recall Coordinator should be consulted before the issuance of a press release whenever possible.

**Evaluation of the Complaint Condition**

Complaint receipt, processing, and evaluation are the first steps in the recall process. The evaluation process includes:

1. Receive the complaint: A REC-R-CC Consumer Complaint record should be maintained containing any product complaints the company receives. Information that should be maintained in the product complaint file is:
    a. Complainant's contact information.
    b. Reported problem with the product.
    c. Product Identification.
    d. Product Storage.
    e. Product purchase date and location.
    f. Illness and Injury details.
2. Provide the complaint to knowledgeable staff for initial evaluation. If the initial assessment indicates a recall may be necessary, the Recall Coordinator assembles the Recall Team for a full evaluation using the REC-R-RR Recall record. To control the Recall Process, a REC-R-RC Recall Checklist must be completed.
3. Determine the potential hazard and evaluate the related safety concerns with the product.
4. Determine the class of the recall, according to the level of hazard involved. Review the chart **Class of recall** at the beginning of this document.
5. Determine the product removal strategy according to the threat level and market distribution/commerce.
6. Contact the appropriate regulatory authorities.
7. Alert legal counsel, insurance, etc. as appropriate.

8. Maintain in a file all recall-related events including information such as dates, actions, communications, and decisions.

MONITORING

1. The person in charge or designated alternate will complete a REC-R-RR Recall record describing at which point of the procedure the product was affected, the reason why the product will be recalled, and the corrective actions that were taken to solve it.
2. The person in charge or designated alternate will ensure that finished goods kept on hold during a recall investigation are not used until the conclusion of the investigation and will supervise the actions taken following the investigation.

CORRECTIVE ACTIONS

If a product is found damaged:

1. The person in charge will be immediately notified.
2. Hold the product; do not destroy any product until appropriate authorization is received.
3. After authorization is given, all the products on hold will be discarded.

VERIFICATION AND RECORD-KEEPING:

The person in charge or designated alternate will check for adherence to recall procedures and for completed REC-R-RR Recall, REC-R-RS Recall Submission to FDA, REC-R-RL Recall Letter, REC-R-RC Recall Checklist, REC-R-RN Recall Notification, and REC-R-CC Consumer Complaint records and SOP-R-DR Deviation Report while performing monthly HACCP audit. All records are maintained for a minimum of 2 years.

## REC-R-MR Mock recall

CRITERIA AND INSTRUCTIONS

In addition to an annual verification of the recall plan, Dupont Street Imports LLC will conduct a mock recall annually or whenever there are significant changes made to the plan or personnel. The mock recall will include the following elements:

1. Selecting a product that has reached the consumer market.
2. Tracing the product from the raw ingredient (e.g. source) level to the finished product in the marketplace.
3. Verifying communications systems (e.g. contact information, test emails, faxes, etc.) to outside contacts.
4. Modifying the recall plan to correct any problems encountered during the test.

5. Records of these mock recalls will be documented and filed appropriately.
6. Traceability practices are done 2-3 times a year.
7. Verifying communications systems (e.g., contact information, test emails, faxes, etc.) to outside contacts.
8. Mock recall activities must be registered in REC-R-MR Mock Recall record.

FREQUENCY

Conduct mock recall once a year or whenever there are significant changes made to the plan or personnel, at least one of these exercises completed outside of normal business hours.

MONITORING

As a normal recall. Records of these mock recalls will be documented and filed appropriately.

CORRECTIVE ACTIONS

The corrective actions need to be reviewed depending on the results of the Mock Recall.

VERIFICATION AND RECORD-KEEPING

Records of these mock recalls will be documented and filed appropriately. All records are maintained for a minimum of 2 years.

# PL-D-REC Recall Records

## REC-R-AA Assigned Responsibilities Record

| Recall Team | |
|---|---|
| Responsible for: | Contact information. |
| Recall coordinator:<br>1. Assemble the recall team<br>2. Maintain the documentation of all recall decisions and actions<br>3. Identify all Products to be Recalled<br>4. Make recall decisions on behalf of **Dupont Street Imports LLC**<br>5. Approval of the Recall<br>6. Control the recalled product(s)<br>7. Determine the recalled product(s) final disposition<br>8. Verify Recall Effectiveness | Name: Steven DeAngelo<br>Position: HACCP Coordinator<br>Phone: (646)339-3719<br>E-mail: steven@greenhookgin.com<br>Signature: |
| Alternate Person – Recall Coordinator | Name: Steven DeAngelo<br>Position: HACCP Coordinator<br>Phone: (646)339-3719<br>E-mail: steven@greenhookgin.com<br>Signature: |
| Management of the information:<br>1. Notify the Appropriate Regulatory Authority.<br>2. Prepare the Press Release (if necessary).<br>3. Notify the recall to suppliers and customers. | Name:<br>Position:<br>Phone:<br>E-mail:<br>Signature: |
| Alternate person - Management of the information | Name:<br>Position:<br>Phone:<br>E-mail:<br>Signature: |

| FDA District Recall Coordinator | |
|---|---|
| **Melissa A. Henaghan**<br><br>Albany Resident Post<br>One Winners Circle, Suite 110<br>Albany NY 12205<br>Phone: 518-453-2314 x 1017<br>Fax: 518-453-2443<br>orahafeast1recalls@fda.hhs.gov | **Randi-Lynn Bodoh**<br><br>Syracuse Resident Post<br>620 Erie Blvd., West<br>Syracuse, NY 13205<br>Phone: 315-448-0876 x 1011<br>orahafeast1recalls@fda.hhs.gov |

# PL-D-FD Food Defense Plan

## PL-D-FD Food Defense Plan

Food defense is the effort to protect food from acts of intentional adulteration intended to cause wide-scale public health harm. The mitigation activities described in this plan include measures to reduce or eliminate the possibility that an intentional adulteration event would occur.

## FD-R-FD Food Defense Team (FDT)

The contact information including phone number, email address, and other after-hours contact information of all committee members should be confirmed and updated as often as necessary.

| Food defense team | | | |
|---|---|---|---|
| Contact information | Position | Responsible for | Signature |
| Steven DeAngelo | HACCP Coordinator/ Person in charge | Food defense team member | |
| | Designated alternates | Food defense team member | |

## Vulnerability assessment

1. List of products and processes
    a. Products: Described in section PL-D-PD Product description.
    b. Processes: Described in the section PL-D-PF Process flow.

| Process | Vulnerability |
|---|---|
| Receiving | • Unapproved Suppliers<br>• General condition of products<br>• Consistency between orders and received products<br>• Delivery vehicle looked |
| Storage | • Unauthorized access of people or products<br>• Adulteration of ingredients or packaging materials |
| Production | • Unauthorized access of people or products<br>• Adulteration of recipes / formulation |

| | |
|---|---|
| Packaging | • Unauthorized access of people or products<br>• Adulteration of products or packaging materials |
| Shipping | • Protection of the packages on shipping (vehicle locked) |

2. Identification of vulnerable steps.

## Actionable process steps

| Process | Required actions |
|---|---|
| Receiving | • Measures to select suppliers.<br>• Measures to ensure control of the received ingredients and materials |
| Storage | • Measures to control the access to the production area.<br>• Measures to prevent intentional adulteration of ingredients and packaging materials |
| Production | • Measures to control the access to the production area.<br>• Measures to prevent intentional adulteration of products during processing activities |
| Packaging | • Measures to control the access to the production area.<br>• Measures to prevent intentional adulteration of finished goods and packaging materials |
| Shipping | • Measures to protect packages on shipping |

## Mitigation activities

| Security Measure | Description | Security | Measures |
|---|---|---|---|
| Outside | These measures will prevent unauthorized access by people, or entry of unapproved materials to the facility. | Physical security | 1. Entrances are secured, locks are installed, and operating<br>2. Outside lighting is present to deter unauthorized activities<br>3. Other access points such as windows and vents are secured<br>4. Security cameras and alarm systems are installed |
| | | Receiving security | 1. Entrances are secured, locks are installed, and operating<br>2. Outside lighting is present to deter unauthorized activities<br>3. Other access points such as windows and vents are secured |

| | | | |
|---|---|---|---|
| | | | 4. Security cameras and alarm systems are installed |
| | | Mail Handling Security | 1. Mail is handled away from food including ingredients and packaged food products<br>2. Employees who handle mail are aware of the proper handling of suspicious mail and U.S. Postal Service guidelines. |
| Inside | These measures will protect the product from intentional contamination throughout the production process. | General Inside Security | 1. Suspicious packages are reported to the person in charge<br>2. Restricted areas of the establishment are identified<br>3. Previously unattended materials are checked before use<br>4. Unexpected changes in inventory (product or equipment) are reported to appropriate personnel<br>5. Security cameras and alarm systems are installed<br>6. Inside lighting is present to deter unauthorized activities. |
| | | Processing Area | 1. Security cameras are installed.<br>2. Security cameras have a view of the processing area from all angles.<br>3. Ingredients are examined for possible tampering.<br>4. Records ensure traceability for one step backward, one step forward, or both.<br>5. Access control and ingress and egress signs are used in the production as well as shoe/sole cleaning entry system.<br>6. Periodic cleaning and disinfection of equipment and components.<br>7. Employees works in groups, no employees are working alone<br>8. The person in charge oversees all the activities in the facility and is aware of:<br>▪ Unsecured areas<br>▪ Unescorted visitors<br>▪ Unusual behavior |

| | | | |
|---|---|---|---|
| | | | 7. Abnormal changes in equipment, materials, and ingredients |
| | | Information Security | 1. Access to confidential information is controlled.<br>2. Offices are closed when no personnel present.<br>3. Electronic devices are password protected.<br>4. Confidential physical files are kept under lock and key. |
| | | Storage Area | 1. Stock rotation (first in, first out) is practiced<br>2. Labels and packaging materials are controlled to prevent theft and misuse.<br>3. Inspections are carried out to detect adulteration of stored materials.<br>4. All raw materials are identified and labeled. |
| Water and chemicals | These measures will protect water and chemicals from intentional contamination throughout the production process. | Water and chemicals Security Measures. | 1. Restricted access to drinking water storage tanks and water reuse systems.<br>2. Access is restricted and lines through which water circulates are inspected.<br>3. Hazardous materials or chemicals, including pesticides, cleaning or laboratory materials, and disinfectants are stored in a restricted area. |
| Personnel | These measures will ensure that only authorized personnel are in the facility at any time. | Employee Security | 1. Employees have restrictions on what they can bring in or take from the facility (for example, cameras)<br>2. Background or reference checks are conducted for new hires |
| | | Non-employee Security (Example: visitors, contractors, guests, customers, truck drivers) | 1. A method to recognize or identify employees in the facility is in place<br>2. Visitors register their entrance and are escorted by one member of the personnel<br>3. Visitors have restrictions on what they can bring in or take from the facility<br>4. Visitors are restricted to appropriate areas. |

| | | | |
|---|---|---|---|
| | | Security Training | 1. Employees are trained to report suspicious activities or unusual observations |
| Incident Response | These measures will ensure that the company responds quickly to a product contamination threat or event using planned measures | Investigating Security Concerns | 1. Employees have restrictions on what they can bring in or take from the facility (for example, cameras)<br>2. Background or reference checks are conducted for new hires |
| | | Other Plan Security | 1. A product recall plan is maintained and periodically reviewed |

Key personnel is trained in product recall procedures.

# Annex 1. Legal References

## Process Authority Letter

Cornell AgriTech
New York State Agricultural Experiment Station

Cornell CALS
College of Agriculture and Life Sciences

March 29, 2022

Steven DeAngelo
DUPONT STREET IMPORTS LLC
208 Dupont Street
Brooklyn, NY 11222

Dear Steven DeAngelo:

I am writing to follow up on earlier communications we have had regarding the ST. AGRESTIS PHONY NEGRONI product that you wish to market. If you follow the enclosed formulas and procedures as written and follow the current good manufacturing practices (detailed in The Code of Federal Regulations Title 21 Parts 117 Subpart B and record keeping in Subpart F and 114), you should not have any problems of public health concern. Be sure to keep records in ink of all safety, quality, and processing checks that are made on your products. In addition, you must get a license from Agriculture and Markets, if you do not have one already, to begin the commercial preparation of your products. Amendments to the above schedule processes will be billed in order to offset expenses.

If your product has a pH of 4.0 or above and the schedule process specifies pH control values, you must use a pH meter for measurements. Any changes in the formulations of these products must be confirmed in writing by a processing authority.

The following articles should be in the folder of information that you received when you first contacted the Food Venture Center. If the files are not available, please contact this office to request copies.

1. Do Your Own Establishment Inspection. A guide to Self Inspection for the Smaller Food Processor and Warehouse. HHS Publication No. (FDA) 82-2163.
2. Code of Federal Regulations Title 21 Part 114.90
3. Good Manufacturing Practices Guide (21 CFR 117 Subpart B and record keeping in Subpart F)

Our programs also offer several fee-based trainings that may be of interest to you, including Better Process Control School and Good Manufacturing Practices Part 117 Online Course.

Information regarding trainings can be found at: https://instituteforfoodsafety.cornell.edu/trainings

If we can be of further assistance, please do not hesitate to call or write.

Sincerely,

Dr. Bruno Xavier
Process Authority
Cornell Food Venture Center

## Alcohol content

27 CFR 7.65 Alcohol content

The term “non-alcoholic” may be used on labels of malt beverages only if the statement “**contains less than 0.5 percent (or .5%) alcohol by volume**” appears immediately adjacent to it, in readily legible printing, and on a completely contrasting background.