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Objective: A primary objective of Boortmalt is to market safe products of consistent quality that meet or exceed the expectations of our customers and consumers. This document outlines expectations that are designed to help our warehousing, storing, and handling partners to meet this objective by identifying those programs which will help protect product safety and quality, prevent product retrievals and consumer complaints.

It is expected that suppliers, including service provider shall, at all times, take all reasonable safety precautions and shall exercise reasonable care, follow customary warehousing practices, and comply with all applicable federal, state and local regulations, ordinances and laws including those pertinent to the receiving, handling and storing of sanitary food products.

In summary, the application of these expectations and other documents, contain the basic elements needed to assure effective management of Food Safety, Quality and the protection of products from willful contamination [Food Defense].


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Introduction: Boortmalt views its suppliers of warehousing, storage and handling and transportation services for finished products (collectively referred to as Suppliers) as an extension of our company. We respect our supplier network and strive for the development of a relationship that will continually improve the product quality and safety that our customers and consumers demand.

Expectations set forth in this document are a minimum set of quality programs that should serve as a solid foundation for supplier quality systems. Boortmalt is committed to delivering safe, quality foods through the development, implementation and maintenance of policies and procedures in accordance with Boortmalt policies and procedures, applicable international, federal, state and local laws and regulations and Global Food Safety Initiative (GFSI) standards. We rely on our suppliers to embrace these programs and implement a culture of food safety and quality.

This document does not outline or mandate how to set up or operate a supplier’s facility to meet the expectations set forth by Boortmalt. Suppliers are solely responsible for operating their facilities in a manner that complies with this document and all applicable federal, state and local laws and, assuring the supply of safe products conforming to Boortmalt specifications. Further, this document does not shift compliance responsibility from service suppliers to Boortmalt.

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SECTION I: WAREHOUSING/STORAGE (PACKAGED PRODUCT)

Chapter 1: Quality Management Systems

The supplier/facility must establish, document, implement and maintain a quality management system as a means of assuring that Boortmalt products are handled, stored and transported in conformance with specified requirements (agreed in the contract), and continually improve its effectiveness in accordance with the requirements given in this document. This includes compliance with these requirements, Boortmalt specifications and any applicable regulatory requirements.

The quality management system documentation shall include:

- Documented procedures for the warehousing, handling, storage, and transportation (as applicable) of Boortmalt products.
- Procedures for the Control of Documents and Records related to Boortmalt products
- Procedures and documents shall be accurate, reviewed, dated, approved by management and distribution controlled.
- Documentation shall be up-to-date and available to staff at all locations to enable them to perform their role in the quality system.

Document and data retention for Boortmalt products must be three years from activity date.


Chapter 2: Management Responsibility:

2.1: Responsibility, Authority and Communication

The responsibility, authority and the interrelation of personnel, who manage, perform and verify work affecting compliance with Food Quality/Safety requirements shall be defined and documented. This information shall be included in policies, procedures and job descriptions, etc.

2.2: Food Regulatory Agency Inspections and Contacts

Each warehouse shall be registered with FDA per requirements of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and applicable FDA regulations, including 21 C.F.R. Part 1, Subpart H (as may be amended from time to time). Warehouses outside of the US shall meet the requirements of the country of operation.

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Each facility must have a system in place to provide written and oral notification to Boortmalt for any inspection relating to materials or products stored for Boortmalt. For any of the following relating to Boortmalt product, *the facility shall immediately contact Boortmalt* (see Appendix B) and provide the written report from the inspection within 24 hours of completion of inspection:

- Visits, inspections or sample collections from external regulatory bodies
- Regulatory actions or product hold due to regulatory sampling
- Product holds directed by a regulatory or law enforcement body due to Food Defense related threat or suspicion
- Product retrievals

A traceability report shall be immediately issued for the concerned lot (quantity received in the warehouse, in stock, and shipped out by delivery point and by date) and be available to the Boortmalt contact (Appendix B).

If any product handled for Boortmalt is sampled by a regulatory agency, all products with the same lot code as that sample (SKU/ production period) shall be placed on hold and the Boortmalt Representative contacted for instruction prior to release (Appendix B). Decisions on subsequent action to be taken will be made by the Boortmalt Quality Team and must be documented

A duplicate sample (sampled by the external regulatory body or the site) of the lot of any material taken by the external regulatory bodies is required to be retained by Boortmalt and stored at the facility unless otherwise requested by the Boortmalt representative. Samples shall be labelled and stored under appropriate conditions


If questions arise during a regulatory inspection specific to Boortmalt products or policies, please reach out to Boortmalt for additional guidance (Appendix B).

Chapter 3: Resource Management

3.1 Good Warehousing Practices

Good Warehousing Practices shall be established to ensure that products are stored and handled under sanitary conditions.

GMP practices should include (at minimum):

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- Personal Hygiene: including personal cleanliness, protective work wear and hair protection. Controls shall be in place to ensure that employees wash their hands when necessary.
- Restriction of eating, drinking, chewing gum or tobacco, smoking, use to designated areas
- Restriction of jewellery or other temporary enhancements (false eyelashes/fingernails), body piercings or any personal items in the product handling areas.


Warehousing, handling, storage, and transportation practices (GWP) must be followed to ensure that products are stored and handled under sanitary conditions as required by applicable laws and regulations, including 21 C.F.R. Part 117, Subpart B.

3.1.1. Employee Personal Practices:


- Each Facility shall assure that all personnel, visitors and contractors follow the GMP/GWP.

3.1.2 Good Warehouse Practices:

- All items **must be** stored to avoid direct contact with the floor (e.g., on pallets, slip sheets or racks). Sitting or standing on product shipping cases is prohibited. Over stacking of product must be avoided.
- Products must not be stored immediately adjacent to containers for waste (does not include identified trash can in the aisle with appropriate sanitation controls) or non-food items (e.g., cleaning compounds).
- Soiled and/or dusty exteriors of bags or other product containers must be cleaned before they are conveyed into the warehouse or to customers.
- Broken or spilled product must be cleaned up in a timely manner. Product with exposed contents or those which have been punctured or opened in any way *cannot* be recouped, sold, or transferred to another container. Product must be disposed of according to local, state, and federal waste disposal regulations and site procedures.
- Damaged products must be disposed of promptly and not allowed to accumulate in excessive amounts.
- Glass and brittle plastics policy and breakage procedure must be in place and documented.

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- Pallets must be stored in areas that are free of moisture, dirt and litter, and free of bird, insect or rodent contamination.
- Pallets should not be stored outside (i.e., exterior to the building). If pallets are stored outside, they need to be appropriately inspected to assure that they are clean, dry, and free of pests or mold prior to use.
- A pallet inspection program shall be in place to verify that pallets are suitable for use (e.g., clean, dry, free from mold, off-odors and infestation, no broken wood or loose nails). The program shall cover:
 - New pallets
 - Incoming goods pallets
 - Shipped product pallets
 - Waste / disposable pallets
- Wooden Pallets with following critical defects shall be rejected following a defined visual inspection process
 - Pest infestation (pests dead or alive)
 - Unacceptable moisture, decayed, rotten or mouldy
 - Snow, ice or standing water
 - Glass splinters, loose nails or staples
 - Off-odours (e.g., fish, taint, chemicals)
 - Unacceptable level of dirt, dust or chemicals, glue, oil or pieces of other material (e.g., cement, packaging materials, etc.)
 - Protruding nail heads
 - Baseboards that are not securely nailed
 - Cross-grain splits running the full width of the board
 - Open horizontal splits across any block
 - Greater than 50% of missing wood across the nail area
 - Any form of transferable contamination presenting a risk of taint, damage to product or risk for foreign material exposure or potential harmful to human health.

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3.2 Competence, Awareness and Training

Documented procedures shall be established and maintained for employee selection and hiring, and the training of all personnel, including temporary, consultants, or contractors, visitors entering production areas and / or performing activities affecting compliance with the supplier expectation requirements.

Each facility shall determine training needs and ensure employees receive appropriate training from qualified trainers. Effectiveness of the training shall be assessed by defined means to assure that training objectives are met. Records of all training shall be maintained.

3.2.1: Each facility must assure that all employees handling Boortmalt product receive appropriate training in:

- The site Quality Management System required to meet the requirements set out in this manual, Boortmalt specifications, and regulatory requirements.
- Good Warehousing Practices (GWP) (for all employees including temporary and seasonal)
- Topics necessary to perform their function satisfactorily e.g., Forklift driving, incoming materials inspection, recording of lot numbers for traceability, etc.
- Employee illnesses and control of communicable diseases.
- Allergens - to ensure awareness and basic understanding to avoid cross contamination when damage or spills occur.
- Hold and release procedures.


Refresher training shall be carried out at appropriate intervals to ensure continued compliance with system requirements.

Visitors entering product handling areas shall be trained in relevant personal and food safety practices.

3.3 – Infrastructure:

The facility must be of sound construction and free from leaks.

Buildings and land shall provide adequate drainage to prevent the formation and retention of standing water, which could provide breeding locations for insects and/or microorganisms, and to prevent entrance or seepage of food borne filth or disease into facilities

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The internal and external structure must be free of cracks, holes, openings, or any other areas that would allow harbourage or entry of pests. (Guidance: a gap of ¼”/6mm can allow entry of mice.)

All exterior doors must be kept closed and must form an adequate seal when closed. Self-closing doors are preferred. Loading docks must be protected to prevent pest entry. Entrance of air must be limited by vestibules, air curtains as appropriate.

Doors, windows and other openings must prevent access to unauthorized people. Where possible, the outer perimeter must be fenced to improve security of the facility and its contents.

Access to utilities (e.g., water supply, heating, ventilation) must be controlled to prevent unauthorized access.

Supply conduits (air, water, electricity) must be installed in such a way (e.g., under the floor) that they do not provide a cleaning/foreign matter/pest control issue.

The internal structure should be free of potential sources of contamination (e.g., flaking paint, condensate from overhead pipes or structures, exhaust fans, grease, fraying insulation, undesirable molds or dirt).

During any construction, sufficient controls must be in place to prevent contamination and ensure adequate sanitation (no dust).

Floors, walls, ceilings, overheads and drains must be cleanable and constructed to resist deterioration from product or cleaning chemicals.


All light fixtures in storage areas must be shielded or have plastic coated bulbs to prevent contamination in case of breakage. Where this is impractical, a documented glass breakage control procedure must be in place and followed.

Where wet cleaning is necessary, floors must be adequately designed to prevent standing water. If applicable, all new floor drain installations must be trapped and vented to prevent sewer gas entry and must be accessible and cleanable.

Hand washing and restroom facilities must be appropriately designed and maintained.

The facility must be capable of providing appropriate temperature and humidity requirements for storage in order to meet Boortmalt specifications for the products concerned.

Facility shall have an effective access control system to prevent routine access by unauthorized personnel

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3.4 - Maintenance Controls

A documented preventive maintenance program must be in place to assure that the building, equipment, and transportation systems do not pose a product contamination or quality risk. This includes but is not limited to all materials handling equipment, and utilities (cooling systems, air ventilation systems, trucks, containers, forklifts, hoses, alarms etc.).

Use of solvents must be controlled to avoid cross contamination.

3.5 - Sanitation Controls

The facility must have a documented sanitation/housekeeping program in place. The program must assure the sustainable cleanliness of storage facilities, product handling areas and all transportation equipment and vehicles, as the nature of the product requires, and with consideration for peak periods. A system for verifying the effectiveness of the sanitation program of the entire facility and the transportation vehicles must be in place.

Cleaning chemicals, equipment and materials used must be suitable for use in a food handling environment.

Hazardous materials or chemicals (e.g., pesticides, cleaning materials, disinfectants) must be secured and segregated from product storage areas. Access to hazardous materials or chemicals must be restricted to allow use by designated employees only.

Precautions must be taken for protection of products during cleaning activities.

Proper tools must be utilized to prevent extraneous matter contamination of the product (e.g., separate tools for floors, drains).


Sanitation procedures, schedules, and records of cleaning must be documented.

The building (ceilings, overheads, walls and floors) and transportation equipment (containers, etc.) must be free from dust, debris, insect webbing, mold growth, etc.

The risk of allergen cross contamination due to broken or spilled product/material of nearby product need to be assessed. In case of risk identified an effective allergen clean up procedure need to be implemented.

3.6 - Pest Control

A documented pest control program and practices must be in place to effectively prevent pest activity in the facility and grounds.

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A designated person shall be responsible for the pest control program.

Pesticides shall be used only when meeting all the following criteria:

- Compliance with all applicable laws.
- Application methods follow label instructions.
- Suitable for use in the designated environment
- Not categorized by the Pesticide Action Network (PAN) as a bad actor.

Note: The use of rodenticides (baits) inside the facility is forbidden. External bait stations are permitted provided:

- Bait stations shall be tamper proof and secured (to prevent movement) and,
- The lid of the bait station shall be securely fastened.

Whether and external company or an internal pest control person is used, the application of pesticides is restricted to licensed applicators. Pesticide applicators shall be appropriately licensed by the relevant local authorities and this licensing shall be documented and maintained.

For each pesticide application the following information must be documented:


- Applicator name
- Each pesticide used along with the volume used,
- Concentrated and diluted volume used
- Pesticide lot number
- Targeted pest
- Area pesticide was used
- Expiration if applicable

Current examples of pesticide labels and Safety Data Sheets (SDS) are to be obtained and maintained for each pesticide and stored on site.

Applicators using pesticides are required to keep records for two years or longer if required by the particular country, state/province and pesticide

Pesticides storage on site must follow local laws. The following requirements also apply:

- There must be a dedicated storage area, reserved for this purpose.

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- The pesticide area must be securely locked at all times when not in use and only pesticides and pesticide application equipment may be stored.
- The pesticide storage area must have a sign clearly designating this area for pesticide storage.
- All relevant safety rules shall also be followed in storing pesticides
- Missing inventory or other irregularities must be investigated and reported to the facility security coordinator

Documentation:

The following records shall be maintained, kept current and shall be available on site:

- Reports of regular facility pest management inspections which shall include:
 - Name of person making the inspection (contractor or internal personnel)
 - Date of the visit
 - Type of visit (scheduled, follow-up, on-demand)
 - Pests found
 - Observations relating to areas of possible pest access, harborage or susceptibility.
 - Immediate actions with details (treatment method, applied pesticides, lot numbers used, location of additional bait stations and their quantities)
 - Corrective action plan and recommendations given based on findings
 - Verification of follow-ups from previous report


Chapter 4: Product Realization (Service Provision)

4.1: Requirements Related to the Product / Service

4.2: Customer Related Processes and Communication

The site shall determine and implement effective arrangements for communicating with Boortmalt in relation to:

- service information and non-conforming product
- enquiries, contracts or order handling, including amendments
- customer feedback, including complaints from Boortmalt or its customers
- Any incident related to Boortmalt product food safety or quality (e.g., tampering, theft, trailer loss, unauthorized intrusions, unauthorized co-loads etc.) and product inventory issues

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In cases where the facility receives complaints from a Boortmalt customer, notification must be made to Boortmalt immediately (maximum of 24 hours – refer to Appendix B). The customer complaint should be acknowledged, but no response may be given by the facility on behalf of Boortmalt without prior authorization. Defined notification procedures including emergency contact lists for internal, external, and consumer contacts must be maintained.

In case of transport incident, the site shall perform a product inspection and/or a risk assessment as per guideline in 4.3.

4.3: Product Receipt & Shipping Controls

Documented procedures for receipt and shipping of Boortmalt products shall be defined for all stages of the distribution process. These shall include, at a minimum:

- Incoming material and product quantities shall be recorded and verified against delivery documents.
- Any damaged or non-conforming stock shall be safely and securely held to avoid cross contamination or release to market and Boortmalt notified

Procedures for reporting stock or delivery issues (e.g., shortages, delayed deliveries) must be agreed with the Boortmalt contracting manager


The following inspection and acceptance criteria shall be in place and documented:

Inbound and outbound vehicles shall be verified to be clean, dry, free from leaks, off odours and unusual residual materials (powder or liquid) prior to loading/unloading

Materials and products shall be inspected for damage, infestation, and potential security concerns such as perforated bags, exposure to moisture, unusual odours or unauthorized co-loads. Products damaged due to moisture, condensation, water, etc. must be destroyed (e.g., landfill or placed in the compactor) unless an alternative method of disposition is approved.

This inspection must be documented.

Note: If there is evidence of unsatisfactory shipping practices or tampering, (load is suspected of being contaminated, unfit, or otherwise unacceptable), notify warehouse management and take pictures. The facility must treat the product as a food safety risk, hold product, and obtain disposition from Boortmalt (refer to Appendix B).

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For LTL shipments of food products that are on the same trailer with chemicals, the necessary procedure is to inspect the materials to insure no visual or odor cross contamination:

- No Visual or Odor Contamination: Unload the materials into normal inventory.
- Visual or Odor Contamination: Unload the materials and place into inventory on Hold.
- If the carrier appears to be at fault, contact Boortmalt Transportation & Logistics for disposition.

A risk assessment shall be carried out by Boortmalt Logistics or a trained warehouse operator and approved by a Boortmalt Quality representative. A Boortmalt Quality representative shall determine the potential impact on the product

If a load is suspected of being infested, the warehouse must isolate the load. If possible, the load should be isolated on a trailer and moved away from the building. The trailer must be sealed.

Inbound and outbound truckloads (Full Truckloads) should be sealed at dispatch by the responsible warehouse employees using a numbered, tamper evident, tamper resistant seal. Seal shall be applied, and the number recorded on the shipping documents by warehouse personnel and not the transport driver.

Upon receipt of a sealed load seals numbers shall be verified to match delivery documentation and shall be inspected by receiving warehouse personnel for integrity. In the event seals numbers do not match seals listed are missing, notify Boortmalt Transport & Logistics (Appendix B).


Note: All trucks with multiple drop points with no more than 24 hours delivery period from time of dispatch: it is sufficient for the vehicle to be under driver lock control, no seal requirement. Boortmalt expects the transport company to maintain the integrity and security of the load throughout the transit.

4.3.1: Order Picking & Shipping:

Product quality and integrity must be preserved during transport

Orders must be picked, assembled and verified against Boortmalt delivery documentation.

Deliveries must be palletized and wrapped according to Boortmalt/Customer specifications.

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Loads must be assembled to Boortmalt/Customer specifications, in such a way as to safeguard the product (e.g., heavy products at bottom).

Appropriate restraints such as load locks, inflatable air bags and corrugated void fillers shall be used to protect product in transit from shifting and to minimize damage in transit

4.3.2: Transport trailers:

All trailers used for the transport of Boortmalt product will comply with the relevant legislation governing the transportation of such products as laid down but not necessarily limited to local legislations.

Transport vehicles must have sound interiors and exteriors, tight seals on all doors and hatches, adequate insulation, and refrigeration unit(s) in working order (where necessary). Solid top, hard-sided, or lockable vehicles must be used.

- Vehicles must be specified as suitable for transportation of foodstuffs:
- All trucks shall allow sealing of the goods
- Clean, Pest and Odor free
- Dry (no condensation on floor, walls or roof)
- In good overall condition, free from damage to walls or roof
- Robust floor, to enable safe loading and unloading operations
- Doors/curtains shall maintain an effective seal to the external environment
- Free from any material that may damage products
- Compatible with security seal mechanism as advised

The inspection of the trailer must be documented.


Vehicles that contain major defects should not be loaded. They should be rejected to the carrier stating the reason for rejection.

Defects that cannot be corrected include:

- objectionable odors,
- evidence of contamination or infestation,
- holes in the floor, roof, or walls, etc.

4.4: Storage

The condition of product in stock must be assessed at appropriate intervals in order to detect contamination, tampering, theft or deterioration, e.g., due to pest infestation, age, unsanitary conditions and temperature/humidity control abuses.

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Access to storage areas (e.g., closed dock doors); including products, packaging materials and exterior storage areas (e.g., tanks, silos) must be restricted to authorized personnel only.

Forklift trucks (FLT) shall be in good repair, clean, free from leaks. FLT utilized inside a facility shall preferably be electric powered.

An effective FIFO (first in first out) or FEFO (first expired, first out) system must be in place for all materials or products stored for Boortmalt.

Pallets, racks and equipment must be maintained in good condition to prevent any physical damage to materials or products (e.g., free from nails, wood splinters etc.).

Airflow from heaters / refrigeration units must be directed away from materials and products.

Product and non–food items must be handled and stored in a manner to avoid contamination, including pests, or transfer of odors. Dividers or other precautions, e.g., traffic controls, separate air systems should be used for protection.

Racking and storage areas (e.g., staging areas, bins) must be adequately spaced from the walls (minimum 18 inches / 45 cm) to allow for inspection of areas for cleanliness, insect or rodent activity and pest control devices. Where this is not possible, alternative means of access must be demonstrated.

Products or materials that have a strong odor must be segregated to avoid cross contamination.

Boortmalt is responsible to specify and communicate the required shipping, storage, and handling conditions for our product. (Appendix E)


Where specified, monitoring of temperature and humidity must be carried out using calibrated recording equipment (See Section 4.4)

Any loss, damage or inconsistency with the list of Goods authorized for storage shall be registered and reported to Boortmalt.

Where local regulations specify conditions for Warehousing, Handling, Storage, Re-packing and Transportation of products these shall also be met.

4.5 - Identification and Traceability

The site shall have a documented and verified system for the identification and traceability Boortmalt products.

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4.5.1: Traceability

For customer shipments, the site must have a documented procedure to identify mixed code date pallets and reflect the correct code date and quantity within the Warehouse Management System (WMS).

Locations that ship to customers must maintain ticket genealogy in the Warehouse Management System (WMS). This information must include the inbound pallets, item and lot code, product movement between pallets, and the outbound pallets.

Packages that are reconfigured (combined or consolidated) into new consumer units must have traceability maintained

The system shall allow the site to trace within **4 hours** the entire history of a specific lot from receipt through all stages of storage and shipping. This shall include identification of all materials handled and the customers to whom products were distributed.

****Time in excess of 4 hours shall be allowed in tracing the individual product components of bundled products with mixed code dates provided Boortmalt still has sufficient time to provide the full history of the products being traced within 24 hours.**

The facility must have capability for tracing and reporting to Boortmalt inventory transactions by lot code, and item number or SKU.


- Receipts
- Shipments
- Pallet to pallet movements (i.e., pick line)
- Inventory Adjustments (i.e., write on, write off)
- Movement to module area or repacker

Periodic recall exercises must be carried out to verify system capability (minimum annually). Boortmalt may also initiate trace exercises to verify system capability and the site is required to participate in such exercises.

To facilitate this process incoming Boortmalt products shall be identified either with the given lot code or Best Before date assigned by Boortmalt or by a warehouse assigned lot number through which the source, date received, and any special characteristics of the material can be determined. **Documentation of the recall must be kept for a minimum of three years for audit purposes.**

Chapter 5: Measurement, Analysis and Improvement

5.1: Hold & Release/Control of Non-Conforming Product

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A written hold & release control program shall be in place to assure that materials and products which need to be specifically identified/isolated and held, pending determination of their final disposition, will not be inadvertently dispatched.

Personnel shall be designated with the authority and responsibility for management of Hold and Release Programs, including monitoring and tracking held product through to final disposition. The Designated Warehouse Personnel must assure that product which does not conform to specified requirements is identified and controlled to prevent its unintended use or distribution

A record of ALL hold events shall be maintained. Available information shall include:

- The hold category
- Code date(s), quantity and/or time affected
- Reason for hold, Investigative information
- Final disposition and authorisation
- Inventory verification and reconciliation


If storage conditions preclude the use of a segregated and secured hold area, or if visual identification or physical obstruction is justifiably not feasible due to quantity/storage constraints, then there must be a defined and effective system in place to assure inadvertent movement or loss of control will not occur. In such a case, the justification must be fully documented, substantiated, and agreed to by Boortmalt (refer to Appendix B)

Any materials or products suspected or identified to be non-conforming shall be placed on hold immediately upon discovery or immediately when requested by Boortmalt. If the non-conformity is detected by the site, the Boortmalt Representative shall be notified immediately.

The specific reason for hold must not be shown on the tag or hold sticker, a numeric reason or code must be used.

Full traceability of all non-conforming products must be in place and inadvertent movement must be prevented through an effective system; *inventory must be controlled*

Where non-conformance is detected in products which are already in distribution Boortmalt shall be notified immediately. Consideration shall be given to identification and segregation of remaining stock

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A process must be in place to immediately notify Boortmalt (refer to Appendix B) when any material or product stored for Boortmalt or designated for shipment is inadvertently released from hold.

Disposition for non-conforming products and / or products on hold shall be approved in writing by a designated Boortmalt quality representative. Complete evidence/ documentation of destruction (e.g., certificates), including identification of materials and products destroyed, must be retained. Upon request, this documentation must be provided to Boortmalt.

Any labelled material or product sent for destruction or animal feed must be disfigured or destroyed to assure that Boortmalt Trademarks cannot be reused in any manner.

All products sent for destruction that is unfit for human or animal consumption must be identified as such in the accompanying documentation.

Boortmalt may contract with authorized third parties to manage transportation and destruction of non-conforming product. In the event the facility is authorized to manage the transportation and destruction of product the following is applicable:

In the case of destruction by the facility, Boortmalt must be provided with the following information:


- the method of destruction,
- The security measures to protect product from misuse
- verification of destruction
- the final destination of the nonconforming product including company name and contact, and truck number as applicable.
- proof that regulatory and environmental requirements are met.

If the site receives goods in “hold” status, the site shall ensure that the products are kept on hold during the hold time as defined by Boortmalt.

5.2 - Returns

A procedure for handling returned materials and products must be in place to prevent re-entry in the distribution chain prior to assessment and Boortmalt approval.

There must be a documented inspection and assessment completed by trained representative (e.g., Warehouse Operator) to determine product disposition. See Section 4.4 for Product Receiving Requirements.

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Boortmalt must be notified (refer to Appendix B) of all returns. Returns must be clearly identified, segregated from regular materials or products, and placed on hold until inspected and dispositioned by Boortmalt authorized personnel (refer to Appendix B).

Returned product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before final disposition.

Boortmalt may authorize warehouse operations to complete inspections of returned product upon verification of appropriate training.

5.3: Corrective and Preventive Action

Corrective action must take place (but is not limited to) when:

- A non-conformity relating to product or product handling caused by the Operator led to a hold (e.g., leaking roof causing water damage)
- Quality system failures lead to non-compliance with these requirements or regulatory requirements.
- Regulatory authorities identify conditions that may violate laws or regulations. The Boortmalt contracting representative must be notified of violations that directly or indirectly impact products stored for Boortmalt and the actions taken to correct the violation and prevent reoccurrence.
- Nonconformities are identified during Boortmalt quality audits or technical visits.


In such cases a root cause analysis shall be conducted, documented and actions taken to prevent recurrence and eliminate such non-conformities promptly. Corrective Actions shall be tracked, monitored, and verified as effective.

5.4: Confidentiality

All sites must establish systematic procedures for the management of confidentiality when working with outside parties. Confidentiality agreement is required by either party to prevent the unintentional disclosure of customer confidential information or disclosure of Boortmalt confidential information.

5.5: Audits

Boortmalt and/or contracted Boortmalt quality auditors shall be authorised to audit/inspect, on-site or remotely, at reasonable times any establishment storing, shipping or handling Boortmalt products.

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The audit/inspection may include review of records, processes, controls and facilities that demonstrate that storage of products for Boortmalt are in line with requirements and specifications.

Limitations: An audit/inspection **shall not** extend to financial data, sales data (other than that directly related to Boortmalt), pricing data or personnel data (other than data regarding qualifications of technical and professional personnel perform functions pertinent to the audit).

Notification of Audits: It is Boortmalt’s policy to give advance notice of intent to conduct on-site or remote an audit/inspection.


Boortmalt auditors shall not be exposed to confidential technology, which could compromise Boortmalt business at a later date. Boortmalt auditors shall be informed prior to the scheduled audit in this instance, of any confidentiality concerns or facility entry requirements.

As part of the Supplier Management Program an assessment is required for transfer stations to ensure our suppliers meet requirements. The Quality Management Team is responsible for all initial approvals for vendor/ storage locations and/or transfer stations.

The initial assessment is an integral part of the overall vendor/supplier approval. To enable Quality team to perform this initial assessment, suppliers should complete a Supplier Evaluation Questionnaire. This document should be returned to Boortmalt along with other requested supporting documents which includes but not limited to:

- 3rd party audit report along with corresponding corrective action report and certificate (if applicable).
- Sanitation Program
- Pest Control Program
- Allergen management program
- Traceability Program/Recall Program
- Preventive Maintenance Program

After initial review, an audit of the facility may be conducted, and approval granted at each location. All approved vendor/suppliers for Boortmalt will be re-audited on a risk-based frequency. Suppliers shall provide updated documentation at any point of time when it is requested by Boortmalt.

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SECTION II: TRANSLOADS/STORAGE (BULK PRODUCT)

Chapter 6: General Requirements

Boortmalt products shall be shipped in compliance with applicable local, state, federal and international regulations. It is Boortmalt’s policy to comply to the fullest extent of the laws which govern and regulate the food industry. All transport suppliers are expected to conform to regulatory requirements under CFR 21 1.900 in the USA or other applicable regulations in the country of operation.

6.1 Regulatory contact:

The facility shall keep accurate records detailing regulatory agency visits and the resolution to all findings documented by the regulatory agency. All suppliers shall notify Boortmalt food safety contact (Appendix B) when any significant regulatory findings

Duplicate samples shall be taken anytime regulatory samples are pulled along with clear documentation of what is to be tested. This may include duplicates for finished product testing for pathogens, pesticide testing, environmental sampling, claims verification, etc.

A hold and positive release program shall be in place to accompany regulatory sampling with written clearance by the sampling agency prior to disposition. If a hold and positive release program is not feasible, Boortmalt shall be notified immediately (Appendix B)

6.2 Traceability:

All transload suppliers shall have:


An effective traceability program that includes product identification, including railcar number and sales order number, and documentation throughout all points in the supply chain from incoming product through product shipment to customers. This includes but not limited to hold stock, destroyed product, and finished product

6.3 Equipment and Maintenance:

Equipment shall be designed and maintained to prevent product contamination.

Equipment shall be made of materials designed to withstand the environment of its intended use, and applicable cleaning compounds and sanitizing agents.

Product contact surfaces shall be constructed from non-toxic materials that are designed for food use.

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An effective preventive and corrective maintenance program shall be in place.

Procedures should be in place to ensure adequate tool controls as well as appropriate cleaning and sanitizing prior to loading/transfer.

Temporary repairs shall be documented and effectively managed.

A calibration program shall be in place for all process monitoring devices that ensure product safety and regulatory compliance (i.e.: scales)

6.4 Sanitation

Facilities shall develop, implement, and document an effective sanitation program to ensure the food transfer/loading equipment and environment are maintained in sanitary condition. This program shall cover daily and other regular sanitation tasks of production and non-production areas.

Sanitation tools and equipment shall be dedicated and properly identified for their intended purpose (e.g., food contact surfaces, floor, non-food contact).

Procedures should be in place to verify effectiveness of cleaning procedures.

Any person involved with sanitation activities shall receive documented training on sanitation procedures specific to their facility and job function.

6.5 Integrated Pest Management


An effective, documented pest control program (rodents, insects, birds and wildlife) shall be in place.

Program shall be supported by a licensed, certified applicator or trained staff and include only certified pesticides in compliance with country regulation.

Pesticides shall be used only when meeting all the following criteria:

- Compliance with all applicable laws.
- Application methods follow label instructions.
- Suitable for use in the designated environment
- Not categorized by the Pesticide Action Network (PAN) as a bad actor.

Note: The use of rodenticides (baits) inside the facility is forbidden. External bait stations are permitted provided:

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- Bait stations shall be tamper proof and secured (to prevent movement) and,
- The lid of the bait station shall be securely fastened.

Pesticide applicators shall be appropriately licensed by the relevant local authorities and this licensing shall be documented and maintained.

For each pesticide application the following information must be documented:

- Applicator name
- Each pesticide used along with the volume used,
- Concentrated and diluted volume used
- Pesticide lot number
- Targeted pest
- Area pesticide was used
- Expiration if applicable

Current examples of pesticide labels and Safety Data Sheets (SDS) are to be obtained and maintained for each pesticide and stored on site.

Applicators using pesticides are required to keep records for two years, or longer if required by the particular country, state/province and pesticide


Pesticides storage on site must follow local laws. The following requirements also apply:

- There must be a dedicated storage area, reserved for this purpose.
- The pesticide area must be securely locked at all times when not in use and only pesticides and pesticide application equipment may be stored.
- The pesticide storage area must have a sign clearly designating this area for pesticide storage.
- All relevant safety rules shall also be followed in storing pesticides
- Missing inventory or other irregularities must be investigated and reported to the facility security coordinator

Documentation:

The following records shall be maintained, kept current and shall be available on site:

- Reports of regular facility pest management inspections which shall include:
 - Name of person making the inspection (contractor or internal personnel)
 - Date of the visit
 - Type of visit (scheduled, follow-up, on-demand)

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- Pests found
- Observations relating to areas of possible pest access, harborage or susceptibility.
- Immediate actions with details (treatment method, applied pesticides, lot numbers used, location of additional bait stations and their quantities)
- Corrective action plan and recommendations given based on findings
- Verification of follow-ups from previous report

Monitoring results, trends analysis and findings shall be evaluated to determine effective short term and long-term corrective actions and proactive prevention.

6.6 Chemical Storage and Usage

Documented chemical control program shall be in place including approved chemical list, inventory control, preparation and usage (chemicals for sanitation, maintenance and stored pesticides).

Lubricants used in food transfer equipment shall be food grade and adequately controlled and labeled. Food grade and non-food grade lubricants shall be stored separately, and in a manner to avoid cross contamination.


Chapter 7: Transportation and Logistics

All suppliers to Boortmalt shall be responsible for sanitary condition and acceptability of all vehicles and bulk transport containers (rail car, truck trailers, tankers). They shall comply with all Boortmalt requirements, applicable laws and regulations and be in good condition to assure the safety and quality of the contents during all phases of transportation including transload locations.

7.1 Receiving:

All products/ingredients shall be received in a manner that protects and assures the safety and quality of the material, complies with applicable laws and regulations, and does not introduce any product safety hazard to the receiving location. This section states the minimum requirements to be followed as defined by Boortmalt unless applicable laws and regulations have more stringent requirements.

Prior to unloading, all vehicle openings and security seals shall be inspected for damage or tampering by a trained employee. All security seals shall be intact, and seal

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numbers shall be matched to the “Bill of Lading” (BOL). Inspection and results shall be documented.

A documented inspection shall be completed of all incoming vehicles and shipments to assure the quality and integrity of the shipment. The content and identification of the vehicle shall be verified as correct and match the Bill of Lading prior to acceptance.

Receipt of all shipments shall be documented to include date received, shipper, vehicle numbers, and description of contents.

All pertinent required documentation (e.g., wash certificate) shall be reviewed and retained according to the corporate records retention schedule. For kosher/halal bulk ingredients, a “kosher/halal wash certificate” or “letter of certification for dedicated kosher/halal bulk vehicle” shall be provided with receiving documentation.

Sampling of ingredients or other materials shall be carried out in a manner which will not contaminate the material or load.

7.2 Requirements for Vehicles and Containers


Transportation vehicles and containers used for transporting Boortmalt products shall comply with applicable laws and regulations and minimum requirements defined by Boortmalt as stated below:

Prior to loading and shipping, all means of transportation used for transport of Boortmalt products shall be thoroughly inspected and cleaned as necessary to protect integrity of the product. The inspection shall include the trailer and all valves, pipes, seals, hose fittings, gaskets, and transfer hoses where applicable. Exterior surfaces of the vehicle and bulk containers must be clean. These inspections shall be documented, and records retained.

All repaired or reconditioned direct food contact vehicles and containers shall confirm work is complete prior to cleaning. Vessel should be fully dried and re-inspected prior to use for transporting or storage of Boortmalt products.

Transportation vehicles, tankers, containers and transfer hoses, gaskets and loading/unloading equipment, temperature-controlled vehicles, shall be:

- In good, safe, and lawful operating condition and free from structural defects and any kind of contamination.
- Used only for food grade materials.
- Clean, dry, odor free and leak proof.

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- Free of contamination and infestation.
- Made of food grade materials that can withstand cleaning and sanitizing (where necessary).
- Capable of being tightly sealed to adequately protect the contents and prevent contamination.
- Capable of handling and delivering Boortmalt products to prevent impact on quality and safety:
 - Pneumatic delivery systems must be capable of maintaining pressure in the range of 5-8 PSI.

All finished product must be protected during transport. Soft sided or open top trucks shall not be used for shipment of products to Boortmalt customers.


Boortmalt products shall not be shipped in mixed loads with other non-food materials where contamination of the food ingredient may occur due to foreign substances, toxic materials, off-odors or other conditions, which may render the food ingredient unacceptable (Appendix F).

Under no circumstances shall transportation vehicles or containers which have transported hazardous waste, as defined by applicable laws and regulations, which includes but is not limited to trash, garbage, waste, asbestos, toxic materials, and infectious or medical wastes, etc. be used for shipment of Boortmalt’s products even after cleaning.

In order to assure food safety, traceability, and quality, the following documentation shall be provided. Missing or inaccurate BOL information may lead to rejection of a load:

- Bill of Lading (BOL) or equivalent shipping documentation, minimum requirements as appropriate are:
- Seal numbers of each security seal attached to the vehicle
- Vehicle information including transportation company and vehicle number
- Origin and destination points (name and address)
- Load description (e.g., name of product, product code, weight, etc.)
- Quantity of each Lot (printed scale ticket)
- Boortmalt purchase order number or invoice number
- Scheduled date of arrival

All bulk containers must comply with all Boortmalt shipping requirements stated above as well as the following:

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When present, all valves, transfer hoses/unloading pipes and ports of bulk liquid/dry cars and tanker trucks shall be cleaned prior to loading to prevent cross contamination and infestation. Boortmalt’s preferred method is purging or filtered air blowing. It is recommended that filtered air be blown through bulk trucks and all pipes and valves a minimum of 5 minutes prior to loading after a wash, and between loads.

Transloading transfer hoses, transportation vehicle and bulk container openings (hatch covers, valves, hoses, doors, and latches, etc.) shall be inspected for cleanliness, integrity, closing ability prior to loading and after loading is completed.

Transportation vehicles and containers used for shipping or storing bulk ingredients shall be washed in compliance with Boortmalt food safety requirements as well as food safety, regulatory and religious certification requirements (e.g., Kosher, Halal) on a risk-based frequency to ensure integrity and quality of the product. Dry loads can be dry cleaned. A validated system flush of the container can be used where applicable. Flushed product shall not be used for resale.

A “Wash Certificate” for all liquid loads and “Dry Clean” certificates for all dry bulk loads shall be available from the driver upon request. This certificate shall include information such as: vendor ID, Carrier ID, Date and time of wash, tanker ID, Previous contents, wash /sanitize method. Kosher/Halal wash certificate is required where applicable claims are made.


All bulk transportation vehicles used to ship liquid or dry ingredients from multiple vendors or to ship ingredients that have dissimilar specification criteria (e.g., Gluten free oat vs standard oat) shall have established sanitation procedures and inspection standards between each load. Dry loads can be dry cleaned.

When containers are returned with any measurable amount of product remaining in the container from the previous load, Boortmalt shall be contacted for disposition of remaining product (Appendix B).

Bulk Railcar and Bulk Trucks opening, and access points shall be protected to prevent contamination, including and during, vehicle loading, unloading and aeration.

7.3 Transload Stations:

The transloading partner must comply with FSMA Sanitary Transportation of Human and Animal Food or other local and regional sanitary transportation requirements (21 CFR 1.900).

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Transload partners must have:

A foreign material control program. Based on risk assessment and material type, metal detector, screens/filters and/or magnets at the terminal end of loading are acceptable. Findings from these devices shall be visually examined and documented before the vehicle leaves the terminal (See 7.7 Control of Physical Hazards and Foreign Material)

A transportation vehicle cleaning and inspection program including, but not limited to hose/valve and transfer pipe inspections.

A documented sanitation and inspection program based on ingredient and load changeover risk assessment. This program shall include cleaning frequency, detailed list of areas and equipment to be cleaned (e.g., cleaning and inspection of transfer hoses between loads) and cleaning methods.

Load identification.

Scale/ flowmeter calibrations and weight certification.

Documentation and record keeping.

7.4 Vehicle, Container and Product Security


All vehicles and containers shipping Boortmalt products shall be properly loaded and immediately sealed in order to minimize the risk of contamination or tampering of the load.

The seal shall be a tamper evident style. The tamper evident seals' specific style and strength is the suppliers' choice, but cable seals are required on bulk rail and truck carriers.

If security seal must be broken for any reason (e.g., border crossing, weigh station) while in transit, the carrier must note the time, date, location, and reason of removal of security seal on the BOL. As soon as practically possible, the container must be resealed with the new seal number, time, date, and location of resealing noted on the BOL.

Where the security seal is broken while in transit, due to acceptable reasons as stated above, the carrier must inform both the shipping location and receiving location of this change and receive their acceptance prior to continuing on to the Boortmalt facility for unloading. Where possible, the agency breaking the seal should reseat the container with their agency specific seal.

A broken, or missing seal can be a cause for rejection at the customer.

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7.5 Fumigation

The transload supplier is responsible to assure compliance with fumigation specifications and applicable laws and regulations in the event a bulk transport unit of product must be fumigated.

Fumigation cannot be done between the shipper and the receiving company (during transit).

7.6 Allergen Control Program


Facility Allergen Control Program shall be a component of the food safety program and shall consider storage practices, cleaning practices, tool and container management. All components of the Allergen Control Program shall be reviewed and updated on an annual basis or more frequently if there are any changes in allergen risk at the facility. Facilities that handle allergens (Appendix D) shall have an Allergen Control Program which includes the following components:

- List of allergens present in the facility.
- Allergen management strategies
- Procedures for receiving, handling, and storage of allergen ingredients and products.
- Storage practices shall be in place to prevent cross contamination of allergenic ingredients with other ingredients, etc. This may include but not limited to physical segregation, dedicated storage areas, unique labels, storing materials on the lowest level.
- Procedures for cleaning after allergen products

Cleaning After Allergen Products

Cleaning after allergen products and when changing from one allergen product to another shall be part of the Facility Allergen Control Plan.

A thorough cleaning shall be completed between allergen containing products/ commodities. At minimum a dry cleaning process consisting of a neutral product flush and visual inspection of the equipment shall be completed. Results of inspection shall be documented by trained personnel.

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Non-conformities discovered during inspection shall be assigned correction and corrective action. All non-conformities and associated corrective action shall be documented.

7.7 Control of Physical Hazards and Foreign Material

All ingredient materials shipped for Boortmalt shall be free of hazardous foreign material and shall be in compliance with Boortmalt specification and local laws or regulations. All transload stations shall have a physical hazard prevention, and control program.

This program shall include prevention of contamination from equipment, or other external sources during transfer; and may include strategic placement of physical contamination detection devices (referred to as “devices”) such as strainers, sifters, scalpers, filters, magnets, x-rays, visual sorters, and/or metal detectors at strategic points in the unloading/handling, transfer system. Devices shall meet applicable laws and regulations for licensing, installation, and operation. Boortmalt shall be contacted if physical contamination is detected.

Devices, if used, shall have an effective management program including:

- Immediate response to findings
- Investigation into source and root cause
- Complete documentation of checks and findings
- Procedures to follow when the device malfunctions

7.8 Glass, Brittle Plastic and Ceramics Control Program

Facilities shall minimize the use of glass, brittle plastic, and ceramic within loading/ container stuffing areas or wherever products are exposed. Necessary glass/brittle plastic/ceramic components (e.g., overhead lights, panel views, control touch screens) shall be located and protected as appropriate to prevent breakage, damage, and/or product contamination. As part of glass, brittle plastic and ceramic control program, facilities shall maintain:

A documented inventory of necessary glass, brittle plastic, and ceramic components located and used in storage, shipping/receiving, and stuffing areas (including wireless/mobile devices that are used for operations).

A documented inspection of these components shall be performed on a frequency based on a risk assessment.


A response procedure for glass, brittle plastic or ceramic breakage or damage.

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This procedure shall address segregation and breakage containment, product evaluation, clean up, documentation of the event, corrective action, etc.

Personnel who are involved with the handling of glass, brittle plastic or ceramic in storage, processing or packaging areas shall receive documented training on the associated hazards and procedures.

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Appendix A: Glossary

Re-Packer: Supplier who receives packed finished products and reconfigures them into a new trade unit of sale (picking and palletizing). There is no direct handling of open/exposed product.

Disposition: Determining and authorizing what must be done with product, ingredient or packaging which has been placed on hold. Examples would include:

- Accept – may be sold through normal channels
- May be accepted, with or without further processing, for alternative applications (Re-graded, for example to liquidation or distressed sales)
- Reject or scrap. Destruction of products and packaging must be carried out in a secure manner to prevent recovery or re-use.

Extraneous Matter/Physical Contamination: Any object or matter which may become part of the product being produced, which is not designed to be part of such product. Extraneous matter may be a foreign object, foreign material or an aberration in the product or product ingredient. Examples may include: metal; stones; wood; animal parts; plastic; paper and extraneous matter inherent to raw materials (bone, nut shells, etc.)

Food Defense: Safeguarding the food supply against intentional acts (or threat of an act), such as mass contamination and product tampering. Food Defense should not be confused with Food Security which, as defined by the World Health Organization (WHO), includes concerns about the availability of a sufficient national food supply.


Government Regulations: The laws and regulations of the location in which products are stored and the laws and regulations of the destination to which products may be shipped.

HACCP (Hazard Analysis and Critical Control Points): A system identifying specific hazard(s) and preventative measures for their control.

Hazard: The potential to cause harm. Hazards can be biological, chemical or physical.

Hold: A status assigned to specified product indicating it must all remain stopped from normal handling processes until further notice. Synonyms include: quarantined, blocked, segregated, contained, embargoed, etc.

Lot: A unique identity given to a defined quantity of a material usually based on time and location of manufacture. For materials received in bulk, the lot would usually be identified as the contents of the bulk vehicle.

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Non-Conforming: Non-fulfilment of a need or expectation that is stated, generally implied, or obligatory

Operator: Any Boortmalt department or third-party company providing a service (e.g., storage, transport) involving the handling of Boortmalt products/raw materials.

Packaging Component: All elements of packaging including adhesives, labels, inks, dyes and stabilizers.

Pathogen: Foodborne microorganism recognized as a hazard that can cause illness or death.

Pesticides: Compounds classified as such by the regulatory authorities of the location where stored and the destination to which products may be delivered. These include, but are not limited to, fungicides, insecticides, rodenticides and herbicides.

Product Retrieval: Any voluntary or involuntary retrieval of product that has been released for distribution.

Product returns: *Within Boortmalt Control:* Third party warehouses directly contracted to Boortmalt, including the warehouses of re-packers, and with systems approved by Boortmalt audit are considered to be within Boortmalt control. *Outside Boortmalt Control:* Product returned from trade or customer’s own warehouses, distributors or stores.


Purchased Materials: equipment, services or materials purchased for use in the Boortmalt operations.

Quality Program: A logical sequence of actions designed to assure specific product quality specifications are met.

Quality Records: Documents detailing the history of a lot of finished product, distribution steps, control charts, inspection results, amount stored, formal releases and disposition.

Quality System: Organizational structure, policies, programs and procedures needed to manage product quality.

Regulatory Action: A seizure, embargo, or hold of any product or a prosecution, injunction, citation, regulatory letter or notice of adverse findings initiated by a federal, state, or local regulatory authority or any federal, state, provincial or local court.

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Regulatory Authority: Any duly authorized agent or employee of any government agency empowered to enforce laws relative to food products. Any religious organization that defines requirements for special product certification (e.g., Kosher).

Regulatory Contact: A visit, inspection, audit, survey, inquiry or other contact by any regulatory authority that results in the identification of objectionable conditions that require a response. This does not include those visits made on a regular basis (i.e., daily, weekly, monthly); unless such a visit alleges a material or product destined for a Boortmalt facility is not in compliance with applicable laws or regulations.

Risk: An estimate of the likely occurrence of a hazard or illness.

Special Situation: A Special Situation includes any product, facility issue or set of circumstances that has the likely potential to expose:

- Consumers, employees or other individuals or entities or the environment to injury, loss, harm or damage, or
- Boortmalt, its employees, products, or tangible or intangible assets to serious legal or regulatory liability, severe adverse publicity, sustainable negative public opinion or damage to the reputation of the company, or
- Boortmalt business operations to severe disruption.

Suitable Facility: A facility in which the design, layout and utilities meet all Good Warehousing/ Distribution Practices (GWP), industry standards and present no food safety or other risk to Boortmalt.

Traceability: The ability to track a specific lot of ingredient/component to the product that contains it; and to track a finished product to the primary external customer(s) or destination(s).

Tankers: closed bulk haulage

Traceability: The ability to track a specific lot of ingredient/component to the product which contains it; and to track a finished product to the primary external customer(s) or destination(s).

Transport incident: Theft, partial theft, damages, clandestine intrusions or any other issues which occurred during the transportation of goods

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Appendix B: Boortmalt Contacts:

Role	Name	Contact Information
QA	Daniel Hymus	Daniel.Hymus@Boortmalt.com 306-951-7200
QA	Catriona Muir	Catriona.Muir@Boortmalt.com 306-280-4025
LOG	Ariel Ordazzo	Ariel.Ordazzo@Boortmalt.com 612-504-1573
REG	Catriona Muir	Catriona.Muir@Boortmalt.com 306-280-4025
REG	Daniel Hymus	Daniel.Hymus@Boortmalt.com 306-951-7200
SUP	Eiel Bach	Eiel.Bach@Boortmalt.com 612-431-2135

Roles	
QA	Quality
LOG	Logistics & Transportation
REG	Regulatory
SUP	Supply Chain

Section of this Manual:	Contact:
Food Regulatory	
Notified upon arrival of Food Regulatory inspection relating to Boortmalt materials or products.	REG, QA, LOG
Notified immediately if Food Regulatory investigator presents a court issued warrant.	REG, QA, LOG
Notified if any product stored for Boortmalt is sampled by a regulatory agency.	REG, QA, LOG
Notified if regulatory inspector photographs any Boortmalt property or product.	REG, QA, LOG
Contacted if questions arise during a regulatory inspection specific to Boortmalt products or policies	REG, QA, LOG
Product Realization	
In cases where the Operator receives complaints from a Boortmalt customer, notification should be made within 24 hours.	LOG, QA, SUP

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Product Receipt and Shipping Controls	
Inbound and outbound vehicles must be inspected and verified to be clean, dry, free from leaks, off-odors and unusual residual materials (powder or liquid) prior to loading/unloading. This inspection must be documented. If a load is suspected of being contaminated, unfit, or otherwise unacceptable, notification must be made.	LOG, QA
Products damaged due to moisture, condensation, water, etc. must be destroyed (e.g., landfill or placed in the compactor) unless an alternative method of disposition is approved.	LOG, QA
Theft of a full trailer or partial trailer load from the Warehouse must be reported within two hours of the first evidence of the occurrence.	LOG, QA, REG
Equipment received with broken, missing, or unreadable seals, or seal numbers that do not match the BOL, must be subjected to a risk assessment to determine the potential for loss, damage, or product tampering.	LOG, QA
In the event there is other evidence of unsatisfactory shipping practices or tampering, then the materials must be immediately placed on hold and contact?	LOG, QA
Visual or Odor Contamination – For LTL shipments of food products that may be on same trailer with chemicals, unload the materials and place into inventory on Hold. If the carrier appears to be at fault, contact Boortmalt Logistics for disposition.	LOG, QA
Control of Non-Conforming Product	
Questions regarding disposition of product	LOG, QA
Where non-conformance is detected in products which are already in distribution	LOG, QA
Notify if any material or product stored for Boortmalt or designated for shipment to a Boortmalt facility or to trade is inadvertently released from hold.	LOG, QA
Consult if not able to use a segregated and secured hold, or if the usual identification is justifiably not feasible due to quantity storage constraints.	LOG, QA

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Returns

Drivers must not accept returns from delivery points unless authorized in advance by the Boortmalt Logistics or Boortmalt Supply Chain	LOG, QA, SUP
Boortmalt must be notified (refer to Appendix B) of all returns. Returns must be clearly identified, segregated from regular materials or products, and placed on hold until inspected and dispositioned by Boortmalt authorized personnel	LOG, QA

External Audits

If Regulatory authorities identify conditions that may violate laws or regulations. Boortmalt must be notified of violations that directly or indirectly impact products stored for Boortmalt and the actions taken to correct the violation and prevent reoccurrence.	QA, LOG, REG
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Appendix C: Food Defense and Food Fraud Mitigation

Food manufacturers, carriers and handlers that operate in the United States or that ship into the United States have the most stringent requirements in the world.


C-TPAT and Food Defense are mutually supportive, although separate programs, formed and enforced under different elements of US legislation. Both are mandatory for manufacturers, warehouses, carriers, handlers and/or shippers of Boortmalt product to the USA.

All Suppliers shall have a Food Defense Program in place to effectively manage risks to protect Boortmalt from intentional acts of adulteration or fraud.

Warehouses, carriers, and transloads acting on behalf of Boortmalt and that in any way handle ingredients or final product will develop written specific procedures to secure Boortmalt product and to deter and prevent intentional contamination and will have protocols in place to quickly and accurately identify, respond to and contain threats or acts of intentional contamination.


(1) Warehouse, carriers, and transloads acting on behalf of Boortmalt who are based in the US, or who are handling, or shipping materials or finished product destined for the United States, are expected to meet the requirements detailed below and must be prepared to provide Boortmalt confirmation, through audit as required, that they have done and will continue to do so:

- Adopt and maintain a facility Food Defense program (outlined below).
- FDA facility registration.
- One-Up-One-Down records maintenance. Maintain records to identify the immediate previous source of food or ingredient received and the immediate subsequent recipient of food or ingredient shipped.
- Detained product. Ensure detained product is held as directed by Boortmalt (See Chapter 5 - Measurement, Analysis and Improvement).
- Meet C-TPAT Minimum Security Criteria if making shipments to the US or Canada but originating elsewhere.
- Container Security. When transporting a container or trailer for a C-TPAT importer, a tamper evident high security seal that meets or exceeds the current ISO 17712:2013 standards for high security seals must be utilized.

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(2) A Food Defense Program must include the following:

- **Program Administration**
 - A documented plan (see <http://www.fda.gov/Food/FoodDefense/default.htm> for guidance) that explains the site’s Food Defense procedures and strategies.
- **Access control.** An access control system will deter people with the intent of harming our products from gaining access to do so. Warehouses, Carriers, and Transloads must implement systems and procedures to identify people who are regularly on site (e.g., employees and contractors) as well as to limit access to restricted areas to authorized people only. Specifically:
 - Processing and manufacturing areas
 - Ingredient and raw material storage areas (to include packaging stocks)
 - Hazardous and chemical storage areas
 - Shipping and receiving areas
- **Background Screening.** Warehouses, Carriers, and Transloads will conduct background screening checks on employee candidates. Applicable law will dictate what kind of background checks can be conducted. In the US, criminal checks, reference and qualification checks, and drug screening are routine and typically addressed in contract language.
- **Shipping and Receiving.** The Warehouse, Carriers, and Transloads must take deliberate steps and implement procedures to monitor and verify the integrity of incoming and outgoing shipments.
- For trucks for multiple drop points with no more than 24 hours delivery period from time of dispatch: it is sufficient for the vehicle to be under driver lock control, no seal requirement, Boortmalt expects the transport company to maintain the integrity and security of the load throughout the transit

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Appendix D: Allergens of Concern


Boortmalt expects that allergens will be managed at each supplier location to prevent cross contamination with Boortmalt products.

In the USA Allergens of Concern are as follows:

- milk,
- eggs,
- fish,
- crustacean
- shellfish,
- wheat,
- soy,
- peanuts, and
- tree nuts.

In Canada, Allergens of Concern are:

- Eggs
- Milk
- Mustard
- Peanuts
- Crustaceans and molluscs
- Fish
- Sesame seeds
- Soy
- Sulphites
- Tree Nuts (almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios and walnuts)
- Wheat and triticale

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Appendix E: Malt Storage and Handling Specifications

In general malt needs to be stored dry without the possibility of moisture or water uptake; additional aeration, particular cooling or heating for malt (storage) should not be necessary.

Malt should be stored at ambient temperatures, away from heat sources and ignition sources. Extreme temperatures should be avoided.

Malt must be stored in a dry location away from any sources of moisture, including equipment exhausts.

Store away from products with strong odors.

Double stacking of pallets is not recommended.

When moving or handling bags of malt (or other bagged ingredients), grasp and hold bags firmly by the sides or the ends.

Moving or handling bags by the “ears” at the top or bottom of the bags can cause them to tear or break.

Dropping or throwing bags can cause them to tear or break.

When restacking or otherwise handling bags of Boortmalt products, avoid sharp objects that could puncture or tear them.

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Appendix F: Previous Loads and Sanitation Requirements

	Wash Ticket Required	Trailers/ Compartments swept and blown clean
CLAY AND CLAY COMPOUNDS		
Actisil	Yes	
Aluminum Hydrosilicate	Yes	
Bentonite	Yes	
Bentonic Clay	Yes	
Bleaching Clay	Yes	
Bleaching Earth	Yes	
Catalyst (not Spent Catalyst or Metal Catalyst)	Yes	
China Clay	Yes	
Colloidal Clay	Yes	
Fuller’s Earth	Yes	
Kaolin	Yes	
Kaolin Clay	Yes	
Magbond	Yes	
Montmorillonite	Yes	
Tonsil	Yes	
Volclay	Yes	
Wilkinite	Yes	
Yellow Stone	Yes	
SAND AND SILICA COMPOUNDS (new, not spent)		
Aluminum hydrosilicate	Yes	

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Crushed Glass	Yes
Crystalline Silica	Yes
Diatomaceous Earth	Yes
Diatomite	Yes
Flint	Yes
Frack Sand	Yes
Glass sand	Yes
Ground Sand	Yes
Ground Silica	Yes
Hydrous alumina silicate	Yes
Min-U-Sil	Yes
Perlite	Yes
Quartz	Yes
Sand	Yes
Sil-Co-Sil	Yes
Silica Sand	Yes
Silican dioxide	Yes
Supersil	Yes
SALT AND BRINES (any other producer)	
Brine	Yes
Halite	Yes
Rock Salt	Yes
Salt	Yes
Salt Brine	Yes
Sodium chloride	Yes

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Solar Salt Yes

CHALK AND LIMESTONE (not Lime, Calcium hydroxide, or Calcium oxide)

Calcite Yes

Calcium carbonate Yes

Chalk Yes

Chalk While Yes

Dolomite (agrillime) Yes

Ground Limestone (Not rocks, pebbles, or chips) Yes

Gypsum (Calcium Sulfate) Yes

Magnesium carbonate Yes

Precipitated chalk Yes

Prepared chalk Yes

Whiting Yes

SUGARS AND STARCHES

Beet Sugar Yes

Cane Sugar Yes

Corn Starch Yes

Dextrose Yes

Fructose Yes

Fruit Sugar Yes

Glucose (dextrose) Yes

Granulated Sugar Yes

Maizena (corn starch) Yes

Rice Starch Yes

Saccharose (sucrose) Yes

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Saccharum (maple sugar)	Yes	
Sucrose	Yes	
Sugar	Yes	
Table Sugar	Yes	
Potato and Potato flakes(dried)	Yes	
Wheat Flour	Yes	
GRAIN AND AGRICULTURAL BY PRODUCTS		
Alfalfa Pellets	No	Yes
Apples	No	Yes
Barley	No	Yes
Barley - Pearled	No	Yes
Barley Screenings	No	Yes
Beet Pellets	No	Yes
Beet Pulp	No	Yes
Beet Shreds	No	Yes
Brewers Dried Grain (feed shipments only)	No	Yes
Canola	No	Yes
Canola Meal	No	Yes
Carrots	No	Yes
Citrus Pulp, Citrus Meal	No	Yes
Corn	No	Yes
Corn Cobs	No	Yes
Corn Pellets	No	Yes
Corn Screenings	No	Yes

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Corn products and derivatives (Corn gluten, Corn meal, Corn starch)	No	Yes
Cotton Seed	No	Yes
Cotton Seed - Starch Coated	No	Yes
Cotton Seed Meal	No	Yes
Dried Distillers Grain (DDG)	No	Yes
Durum	No	Yes
Durum -Semolina	No	Yes
Edible Beans	No	Yes
Fish Meal (feed shipments only)	No	Yes
Flax	No	Yes
Fruit Pulp (apple)	No	Yes
Lentils	No	Yes
Malt	No	Yes
Malt Pellets	No	Yes
Millet	No	Yes
Milo/Sorghum	No	Yes
Oats	No	Yes
Oil Sunflowers	No	Yes
Onions	No	Yes
Peanuts - Raw	No	Yes
Peanuts - Roasted (Bird Seed)	No	Yes
Peas	No	Yes
Potatoes	No	Yes
Poultry Meal (feed shipments only)	No	Yes

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Rice	No	Yes
Rice Hulls	No	Yes
Rye	No	Yes
Safflowers	No	Yes
Soybeans	No	Yes
Soy and Soy Meal (feed shipment only)	No	Yes
Spring Wheat	No	Yes
Sunflower Hulls	No	Yes
Sunflower Meal	No	Yes
Sunflowers - Oil	No	Yes
Sunflowers - Confections	No	Yes
Tomatoes pumice	No	Yes
Wheat and Wheat Mids (feed shipments only)	No	Yes
Winter Wheat	No	Yes

CHEMICALS

Aluminum hydroxide Group

Aluminum hydroxide	Yes
Alumina	Yes
Alumina hydrate	Yes
Bayerite	Yes
Bauxite	Yes
Doyleite	Yes
Gibbsite	Yes
Hydrated Alumina	Yes

Sodium borate Group

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Borax (not Borax Glass)	Yes
Hydrous sodium borate	Yes
Sodium borate	Yes
Sodium borate decahydrate	Yes
Sodium borate Group	
Borax (not Borax Glass)	Yes
Hydrous sodium borate	Yes
Sodium borate	Yes
Sodium borate decahydrate	Yes
Calcium phosphate Group	Yes
Calcium phosphate	Yes
Calcium phosphate dibasic	Yes
Calcium hydrogen phosphate	Yes
Calcium monohydrogen phosphate	Yes
Dibasic calcium phosphate	Yes
Dicalcium phosphate	Yes
Monetite	Yes
Treated Seed for Planting	
Potassium carbonate Group	
Carbonate of potash	Yes
Fly Ash	Yes
Potassium carbonate	Yes
Potash	Yes
Pearl ash	Yes

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Magnesium oxide Group

Magnesium oxide **Yes**

Magnesium – Mica (MicroLite) **Yes**

Sodium carbonate Group

Bicarbonate of Soda **Yes**

Sodium bicarbonate **Yes**

Sodium carbonate **Yes**

Soda ash **Yes**

Sodium phosphate Group **Yes**

Sodium tripolyphosphate **Yes**

Sodium sulfate Group **Yes**

Glauber’s salt **Yes**

Disodium sulfate **Yes**

Mirabilite **Yes**

Salt cake **Yes**

Salt cake disodium sulfate **Yes**

Sodium sulfate **Yes**

Sodium sulfate decahydrate **Yes**

OTHER FERTILIZER

Ammonia Nitrate **Yes**

Map 11-52-0 **Yes**

Phosphate **Yes**

Urea **Yes**

PROHIBITED MATERIALS

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Material originating from mammalian tissue	Not allowed
Hazardous Materials	Not allowed
Toxic or poison materials	Not allowed
Radioactive materials	Not allowed
Pesticides and herbicides	Not allowed
Garbage, trash, or refuse	Not allowed
Sewage, animal or human waste	Not allowed
Banned Ruminants	Not allowed