



FDA AUDIT RESPONSE
SEPTEMBER 21-23, 2010

Date: October 7, 2010

OBSERVATION 1

All reasonable precautions are not taken to ensure that production procedures do not contribute contamination from any source.

- 1.) On 9/21/10, a mixture of dried egg whites and sugar was observed in the sugar hopper on a shared line for products without egg whites. It was explained that only dry wiping is performed on the hopper in between ingredients, and no cleaning is performed on the main lines.

Corrective Action:

Dry wiping will be performed on the ingredient hopper after allergens have been used as ingredients. The (b) (4) line will be cleaned by (b) (4)

(b) (4)

(b) (4)

To validate that (b) (4) is working properly, we send a (b) (4) in order to determine the amount of allergens present after the (b) (4) This sample will be taken on a (b) (4) basis.

- 2.) On 9/22/10, an employee that was monitoring lid integrity was observed touching the food contact side of the lid when applying it to the finished product containers. The employee was then observed performing another task involving touching non food contact surfaces and then returning to applying lids and touching the food contact surface lid. The employee did not wash hands or change gloves between the two tasks.

Corrective Action:

Employees were retrained on the procedure for hand washing and sanitizing after touching non food contact surfaces. Employees were also retrained on the proper procedure for changing gloves between two separate job tasks.

- 3.) On 9/22/10, an employee working the de-palletizer was observed utilizing a metal t-shaped tool to upright fallen jars. The metal tool was observed touching the inside of finished product containers.

Corrective Action:

Employees on de-palletizer were retrained on the procedure for handling empty containers entering the filling line. The metal tool will only be used to touch the outside area of a jar. Fallen jars will be picked up by the de-palletizer employee further down the line.

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- 4.) On 9/21/10 and 9/22/10, peanuts were observed outside in trailers uncovered and open to the elements. Birds were observed in and flying over the peanuts.

Corrective Action:

Trailers are left uncovered for the purpose of drying the peanuts. Peanuts that have too much moisture content are left uncovered in order to reduce the moisture content. Trailers are also left uncovered for the purpose of passing a USDA independent third party grading. During this process, the peanuts are still the responsibility of the farmer. If the peanuts arrive too wet, or if too much foreign material is present, it is the farmer's responsibility to solve these problems. (b) (4)

(b) (4)

(b) (4)

(b) (4)

If everything meets the grade, the peanuts are weighed in and placed into our barns. At this point, the ownership is transferred from farmer to Sunland Inc.

OBSERVATION 2

Effective measures are not being taken to exclude pests from the processing areas and protect against the contamination of food on the premises by pests.

- 1.) On 9/21/10, the East and West rolling dock doors, and roaster room rolling dock door in the main plant was observed open without adequate screening. Flies were observed in the main plant during production.

Corrective Action:

Plastic strips will be placed on east, west, and roaster room rolling dock doors in order to prevent flies and other pests from entering the main plant production area.

- 2.) On 9/22/10, the cleaning room dock door was observed open without adequate screening, and the adjoining door to the roaster room in the production plant was observed open. Flies were observed in the roasting room, grinding room, and fill room of the production plant during production. Flies traps were observed completely full.

Corrective Action:

Employees were retrained on the procedure of ensuring that while unloading

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trailers of product, adjoining doors that lead to roaster room and production plant will remain closed. Fly traps will be checked more frequently to ensure that they do not remain full.

OBSERVATION 3

The plant is not constructed in such a manner as to allow floors to be kept in good repair.

- 1.) On 9/21/10, exposed aggregate and cracks were observed on the washroom floor in the production plant.

Corrective Action:

The entire surface will be sprayed with a sealing solution by December 3, 2010.

OBSERVATION 4

Failure to wear beard covers in an effective manner.

Corrective Action:

- 1.) **The employee that was observed was pulled off the line and retrained on proper beard net usage.**

OBSERVATION 5

The design and construction of equipment and utensils fails to preclude the adulteration of food with contaminants.

- 1.) On 9/21/10, the device used to spread the peanuts out on the crunchy machine was observed rusty.

Corrective Action:

The device was removed and replaced with a stainless piece of new material.

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