



Custom Culinary® Work Instruction – Avon

TITLE: Plant Good Manufacturing Practices - Personnel	
WI # 06.15.01C.01V (09)	Author: Tim Thomas
Date: 09/26/16	Supersedes: 01/08/16

Purpose:

To provide guidelines to ensure Good Manufacturing Practices (GMP's) and Food Safety practices are being followed by facilities that manufacture Custom Culinary products.

Scope:

Custom Culinary® Avon Manufacturing Facility.

Responsibility:

Full time, temporary, contract employees and visitors are required to adhere to the rules listed below. Quality Systems and Plant Management will monitor each department to ensure that the GMPs are being followed. Quality Systems will train employees on the GMPs. Management will audit the GMP guidelines and revise them as needed.

Acronyms and Definitions:

Good Manufacturing Practices (GMP's) - Practices outlined in the Code of Federal Regulations (CFR) which define how to comply with the "food adulteration" provision contained in 21 CFR 117.

COP (Clean Out Of Place) Sink – This is the large sink that is used as an immersion parts washing tank to clean machine parts, valves, tubes and any other piece of equipment to tool that is difficult to clean manually.

Dedicated Production Employees: These are employees who work in the production areas of the plant only. Production areas include: Mixing, Packaging, Melt Tank Room, Hand Pack Room, Batching and Staging. This category includes temporary production personnel. All GMPs must be followed.

Dedicated Warehouse Employees: These are employees who work in the shipping and / or warehouse areas of the plant. These employees enter the production areas of the plant on a limited / as needed basis. All GMPs must be followed.

Research and Development Personnel (R&D): These are employees who work in the Corporate/Lombard location. R&D personnel are at the plant for pilot batches or to obtain samples of raw materials. R&D personnel are routinely in open product areas of the facility, all GMP's must be followed.

USDA Inspectors: USDA inspectors that are assigned to the facility must follow all GMP's.

Communicable Diseases: A disease which can be transmitted to food by an infected person.

Pathogen: An organism which has the ability to cause disease.

Often Transmitted Diseases / Pathogens: Hepatitis A virus, Norwalk (-like) viruses (Noroviruses), Salmonella typhi, Shigella species, Staphylococcus aureus, Streptococcus pyogenes

Occasionally Transmitted Diseases / Pathogens: Campylobacter jejuni, Entamoeba histolytica, Enterohemorrhagic Escherichia coli, Enterotoxigenic Escherichia coli, Giardia lamblia, Nontyphoidal Salmonella, Rotavirus, Taenia solium, Vibrio cholerae 01, Yersinia enterocolitica, Cryptosporidium parvum



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Project Contract Employees: These are employees who are at the facility for a short period of time to complete specific projects. These employees will undergo the specific Contractor GMP training session, and will follow all GMP's unless exceptions are outlined.

Food Grade Material: A material such as a lubricant, or other chemical component which has received acceptable status from a recognized authority for example such as the National Sanitation Foundation (NSF) H-1 or USDA 1998 H-1

Procedure:

- **Disease Control**
 - a. Employees with symptoms or have come in contact with individuals of communicable disease such as: diarrhea, vomiting, open skin sores, boils, fever, dark urine, or jaundice, as well as symptoms associated with region-specific diseases as defined by local medical experts will not be allowed to enter open product (production) areas of the facility, or handle / come in contact with Finished Product, Raw Materials or Product Contact Surfaces. Employees must notify their supervisor if any of these conditions exist. The Supervisor or medical personnel will determine what precautions are necessary to protect product.
 - b. Any open wounds or cuts must be protected with a blue metal detectable bandage, and covered with a glove if applicable. (See Supervisor if wound requires a larger dressing than a bandage).
 - c. If an active employee is diagnosed with a communicable disease, the potential impact to product will be evaluated for the affected period.
 - d. If an active employee is diagnosed with a communicable disease, the employee may return to work with a note from their doctor stating the employee is cleared for work.

- **Uniforms / Clothing**
 - a. See Avon Plant Uniform Policy

- **Hair Covering**
 - a. Hair nets must be worn in the entire plant except for the following areas:
 - i. Offices
 - ii. Lunch Room
 - iii. Washrooms
 - iv. Maintenance shop
 - v. Laboratory
 - vi. Employee Hallway

If anyone is wearing a cap, a hairnet is worn covering the head with another hair net covering the cap. **Hair nets are not required over Bump caps issued to Filling Room employees, contractors, USDA or visitors. Bump caps will be maintained in a sanitary condition. Hair nets are still required on the head under the bump cap.**

- b. Anyone entering or working in the production or shipping areas of the plant must wear a hairnet, regardless of quantity of hair. All hair must be covered by a hair net, including covering the ears. Hairnets are to be removed when going outside, a fresh hair net is required when re-entering the plant.
- c. The color of the hair net is to be worn as follows:
 - White: All Custom Culinary, Griffith Laboratories employees, daily contract employees and USDA Inspectors,
 - White: Temporary employees or Daily Contract Employees working for Custom Culinary



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- d. Facial hair
 - White: Visitors and Contractors
 - Sideburns that extend below the ear must be covered by a hairnet or a beard net.
 - Mustaches and any other facial hair must be covered by a beard net at all times regardless of plant location. A beard net is required if there is visible facial growth or >1 day of growth.
- **Personal Practices**
 - a. No food or drinks are allowed in the production areas of plant or the warehouse. *
 - b. No glass is allowed in the plant. (except production raw materials)
 - c. No medications are allowed into the open product areas of the plant. **Employees must contact supervisor if wearing medical bracelets or need prescribed medication near production areas.**
 - d. The following practices are not allowed in the plant:
 - Gum or Candy chewing
 - Using toothpicks
 - Using any tobacco products
 - Spitting in any location within the building
 - No staples, paper clips, push pins etc. to be used in open product areas of the facility.
 - No pencils
 - Electronic cigarettes shall not be permitted to be used or brought into production or storage areas.
 - e. No smoking in the building. Smoking is allowed in designated areas only (away from the building).
 - f. No jewelry can be worn in the production areas of the facility. The only exception is a plain band (no stones) and medic alert identification. This includes watches, rings, bracelets, earrings, hair accessories, etc. Medical alert bracelets must be tucked into a glove (bracelets are preferred to necklaces).
 - g. No rings or studs in exposed parts of the body, such as ears, nose, tongue, eyebrow, etc.
 - h. No false eyelashes.
 - i. No objects are to be stored behind the ear or in pockets above the waist.
 - j. Employees must maintain a high degree of personal cleanliness.
 - k. Excessive perfume / cologne is not to be worn in production areas or in the warehouse.
 - l. Employees must take every precaution to prevent perspiration from contaminating products and packaging.
 - m. Personal items may not be stored in production areas. Store all personal items in lockers**
 - n. Do not store clean uniforms next to personal clothes in a locker.
 - o. Do not wear lab coats, aprons, gloves or sleeve covers into the rest room. (These items must be hung up on the hooks provided outside of the rest room)
 - p. Do not wear lab coats into the lunch room. Lab coats will need to be hung up on hooks provided.
 - q. Do not eat while wearing a lab coat. (Testing or evaluation of products in the Quality Systems laboratory is the exception,
 - r. If the visitors have an infectious disease prior to entering any food production area management will ask them to come back to the facility when they are totally recovered from the infectious disease.
- **RTE vs. Raw Areas**
 - a. The production areas of the Avon plant are separated by a wall between the Ready-To-Eat (RTE) and Raw sides of the facility.
 - b. There are two separate entrances into the plant, one into the Raw area and one into the RTE area.
 - c. Employees are assigned appropriate footwear, uniforms, etc. depending on which side they are assigned to work.



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- d. Permanent employees will be issued green or red shoelaces for their footwear, Red indicating the footwear is for the Raw area and Green indicating the footwear is for the RTE area.
 - e. Movement of personnel, equipment, product, supplies, etc. between Raw and RTE must be minimized.
 - f. If an employee needs to go into the side of the facility they are wearing proper footwear to enter they must either change into approved footwear or wear shoe coverings, and don appropriate uniform.
- **Personal Food (Storage)**
 - a. All plant personal food (lunches) must be stored in the lunchroom. Refrigerators are provided for employee use.
 - b. No food can be stored in lockers, work stations on the floor, or other welfare areas.
 - c. All food is to be eaten in the lunchroom or designated areas.
 - **Storage and Use of Food Grade Materials**
 - a. Materials that may contact raw ingredients, work in process (WIP) or finished goods shall be food grade.
 - b. Food Grade materials used in production to maintain equipment shall be stored protected from non-food grade materials.
 - **Use of Product Contact Packaging Materials**
 - a. *No product contact packaging materials will be used for anything other than their intended use*
 - **Sinks**
 - a. Only use a sink for its designated purpose.
 - Hand wash sinks are for hand washing only
 - Do not wash equipment in Hand Wash Only sinks
 - b. Equipment can be washed in:
 - COP (Clean Out of Place) sink
 - Equipment wash sink
 - **Allergens**
 - a. The Avon facility has all the big 8 allergens:
 1. Fin fish
 2. Tree Nuts
 3. Egg
 4. Milk
 5. Shell Fish
 6. Soy
 7. Wheat
 8. Peanuts
 - b. We also ship to Canada which we declare Sesame, Mollusks, Mustard and Gluten.
 - c. There are sensitivities current in the facility as sulphites and yellow #5,
 - d. Depending on where you work a separate training will be conducted based on job responsibilities.
 - **Hands / Gloves**
 - a. All employees must wash their hands when starting their shift or returning from any break.
 - b. All employees must wash their hands when gloves are ripped, torn or soiled.



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- c. All employees must wash their hands after using the rest room.
- d. All employees must wash their hands after coughing or sneezing.
- e. All employees must wash their hands after removing garbage, changing “species”, handling allergens or any time their hands have been contaminated.
- f. *All employees should wash their hands when they enter the Filling or Packaging rooms, unless they are traveling between the Filling and Packaging rooms*
- g. All employees must wear clean disposable gloves when coming in direct contact with:
 - Product
 - Product Contact Surfaces
 - Packaging
- h. Gloves shall be changed per the “Glove Usage” procedure.
- i. False fingernails, fingernail polish and fingernail jewelry are not allowed to be worn by persons working in the production, packaging or warehouse areas of the plant. Fingernails shall be kept short and clean. Nail art is not allowed.

The only exception to this policy is the following: personnel or visitors who are only passing thru the warehouse to get to the Receiving, Purchasing offices or to the lunchroom. At management discretion, a visitor may be allowed to wear gloves over their fingernails for purposes of a plant tour.

- **Violations**

Employees who do not comply with a GMP listed in this procedure will receive progressive discipline, up to and including termination. Visitors, Contractors, etc. will be required to leave the area that the GMP is required in.

- **Exceptions**

Exceptions to this procedure may only be granted by the VP of Quality Systems or their designate, and only on a temporary (short-term) basis. Exceptions will not be made for personnel that routinely work in the production or packaging areas of the facility, where product is exposed.

* At the discretion of Management, employees will be allowed to have plastic bottles, with a lid, filled with plain water only. Flavored water may be allowed at Management’s discretion, but only in the warehouse area. In cases of extreme weather/heat employee welfare will be accommodated.

**All lockers are company property and are subject to random audits for GMP compliance

Change History

- 12/06/13 – Specified hair covering requirements
- 5/3/13 – Converted to new format for Quality Manual
- 5/31/13 – Updated requirements for disease control and return to work
- 2/27/14 – Added storage requirements for food grade chemicals.
- 01/20/15- added glass only for raw materials, added employees with medicines need to contact supervisor.
- 02/03/15- added “came in contact with individuals”
- 07/14/15- added electric cigarettes not allowed in production areas.-KS
- 07/24/15- added nail art statement for BRC 7. –KS
- 11/11/15- added push pins for BRC-7-KS



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- 01/06/16- added bump cap requirements-KS
- 01/08/2016- Added allergen section and updated quiz- KS
- 09/26/2016- changed from 110 to 117 to meet FSMA.-KS

Attachments:

- GMP Quiz

Related Documents:

Glove Usage Procedure
Uniform Policy

Regulatory References:

21 CFR 117 FDA cGMP Regulations



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GMPs – QUIZ Facilitator: _____ Pass / Fail

Name: _____ Date: _____

Please circle your answers below:

1. Only hourly employees must follow GMPs
 - a) True
 - b) False

2. Which item is allowed to be worn in production?
 - a) Small earrings
 - b) Necklace
 - c) Watch
 - d) Plain Wedding Band

3. When should you wash your hands?
 - a) After using the restroom
 - b) After handling garbage
 - c) When returning from lunch
 - d) All of the above

4. The following can be stored in a locker
 - a) Your lunch
 - b) Personal clothes
 - c) Your uniforms (with your clothes)
 - d) Extra gloves and hairnets

5. The facility has all of the big eight allergens?
 - a) True
 - b) False

6. Gloves only need to be changed when ripped and torn
 - a) True
 - b) False

7. Can uniforms be washed at home?
 - a) Yes
 - b) No

8. What types of bandage is acceptable in the production areas?
 - a) A cloth type
 - b) One from Home
 - c) A metal detectable type
 - d) Anything that is available

9. A beard net needs to be worn over a mustache in all areas inside the plant
 - a) True
 - b) False

10. Food Grade materials used in production to maintain equipment shall be stored protected from non- food grade materials.
 - a) True
 - b) False