

Food Safety: Appleton Plant

New Hire, Refresher & Contractor Training



Updated JAN 2021

Agenda

- Introduction
- Food Safety Policy
- HACCP
- 7 Critical Parameters for Controlling Food Safety:
 - » Maintenance Program
 - » Glass Control
 - » Personnel Hygiene and Practices
 - » Allergen Awareness and Control
 - » Sanitation
 - » Chemical Control and Labeling
 - » Food Defense and Intentional Contamination

Introduction

- Appvion produces food contact packaging materials in 18-building. Therefore 18-building must be compliant with US Food and Drug Administration (FDA) regulations known as Good Manufacturing Practices (GMPs).
- GMPs are a specific set of mandatory “rules” and procedures that govern how food contact materials are manufactured.
 - » Products produced in 18-building must remain safe and sanitary as they pass through all operations from material unloading, coating application, and rewinding, to product loading.
- Appvion requires all employees working in 18 building to receive the training outlined in this presentation

Food Safety Plan (FSP)

- Appvion's Food Safety Plan (FSP) clearly defines policies, processes, and procedures that support the principles of Food Safety.
- Where can you find food safety information?
 - » Appleton Plant SharePoint homepage → select Food Safety from the column on the left

Site Actions

APPVION Appleton Plant Default

Appleton Plant Other Design 1 Design 2 Design 3 Design 4 Design 7 Design 8 Safety Appleton Plant Staff

Lists
Appvion Performance System
Report Sources
BI Portal
Monthly Reports & Scorecards
Appleton Plant Loss Control Policy
Non-Conformances
Nonperformance (NCP)
OTM/Ops Lead/UM Phone Listing
Site Feedback
Design Shared
ISO - What You Need To Know
Food Safety
Vacation Schedule
Safety Participation Tracking
Appvion Excellence Award
Problem Solving Archive
Recycle Bin

Announcement:

Appvion Safety Vision
Zero injuries every day for everyone!
Bingo Winners will be drawn the 2nd Wednesday of every month

Safety Bingo Word of the Day
SAFETY, SSSC, THINK
Click Here For All Safety Words To Date

Human Resources	Intranet Team
Coordinator Resources	Quality Control
Plant Purchasing	Plant I.S.
PIC	Admin Flex Team

We commit to ourselves, each other
make safety a part of everything we

Safety

Appleton Plant has been incoi

Food Safety Policy

Appvion, Inc. Food Safety

Letter of Commitment

We at Appvion, Inc. fully support the principles of Food Safety, Preventive Controls, Critical Control Points and the Hazard Analysis processes at our facility. It is important that policies, processes and procedures are clearly defined and followed by all employees. This is to confirm the information outlined in these documents are factual and demonstrates our commitment to Food Safety for our products and our customers.

The management and staff of our company are committed to support The Food Safety Team for the development, implementation, and maintenance of the Food Safety Program. We will also provide training and development of an understanding food safety at all levels including operators who are directly involved in Food Safety Tasks.

Management will ensure that all governments (Federal, Provincial, and Municipal) regulations are followed.

The Food Safety program is considered necessary to allow us to receive, store and distribute safe products as a condition of doing business with our customers.

Our intent is to build a Food Safety culture of awareness in everything we do!


Plant Operations Manager - Appleton

5/10/20

HACCP

- What is HACCP?
 - » Hazard Analysis and Critical Control Points
 - » A systematic preventive approach to food safety
 - » Identifying the highest risks in the process that need to be addressed to ensure that the product being produced remains free of contamination and safe for food contact applications
- Completed Hazard Analyses are located on the food safety SharePoint site
- Appvion has a food safety team which includes HACCP certified members, you can locate active team members on the food safety homepage



7 Critical Parameters for Controlling Food Safety

- Appvion worked with ASI as a consultant to identify 7 critical parameters for controlling food safety, which will be the GMPs covered in this training:
 - » Maintenance Program
 - » Glass Control
 - » Personnel Hygiene and Practices
 - » Allergen Awareness and Control (Including Air Quality)
 - » Sanitation
 - » Chemical Control
 - » Food Defense (Including Logistics Program)



Maintenance

- Maintenance activities that are critical to food safety are identified and managed through scheduled preventive maintenance tasks in Champs
- Unplanned maintenance for food safety should be submitted in Champs as a “FDA Safety” work order class
- Coater and Maintenance personnel are to be trained on work instruction 3F04. [Emergency Maintenance](#) which is followed to ensure minimal contamination when emergency maintenance occurs
- Grease and Oil “Drop In” contamination is a food safety risk, special precautions to use food grade lubricants and oil on critical equipment have been taken

Glass Control

- Broken glass and brittle plastic are not easily detected in finished product, to reduce the risk Appvion follows SOP 11.7.3a Glass and Hard Plastic Control. Some key takeaways are:
 - » Broken glass should be reported IMMEDIATELY, strict clean up protocols need to be followed
 - » An active glass log is maintained and audited to verify the glass inventory in the building
 - » Cell Phones and other hand-held devices that have glass or plastic screens, or other components, shall remain in the user's control at all times. The user should limit the use of such devices to office areas, whenever possible.
 - » Glass light bulbs in storage and dock areas must be shielded or LEDs used

Personnel Hygiene – Hand Washing

- Hand Washing ensures food safety hazards such as dirt, allergens, and bodily fluids are not transferred to the product through poor hygiene practices

- Hand Washing is required after:
 - » Every absence from the workstation
 - » Each break
 - » Using the restroom
 - » Anytime hands become soiled such as touching the floor or unclean surfaces

- Hands are washed for a minimum of 20 seconds with a 5 second minimum rinse

Personnel Hygiene - Clothing

This is in addition to Appvion wide clothing policies

- Clothing requirements ensure food safety hazards such as hair, bodily fluids, etc. do not contaminate the product

- Employees will wear clean clothes. Cleanliness will be evaluated by the supervisor.
- No cut-off shirts or tank tops
- No shorts, capris, etc. – Long pants required
- No false nails or false eyelashes
 - » Fingernails shall be kept clean and trimmed
 - » Fingernail polish shall be intact and no chipping
- Hairnets are required and must cover hair completely
- Beard nets are required for beards, visible stubble and mustaches extending more than ¼” below the mouth and must cover all exposed hair
- No jewelry
- No excessive use of cologne or perfume
- Nothing allowed in pockets above the waist

Personnel Hygiene - Clothing

This is in addition to Appvion wide clothing policies

- Wherever gloves are used for food packaging contact, they shall be fit for purpose and in good condition

- Personal protective equipment, where required, shall be designed to prevent contamination and shall be maintained in hygienic condition

- Personal items, such as medicines, are permissible in designated areas only

- Writing implements or loose items are restricted in areas where they could contaminate raw materials

- Personal lockers shall be maintained free from rubbish, soiled clothing, and food
 - » Storing tools that contact food packaging in lockers is prohibited

Personnel Hygiene – Food and Drink

- Food and Drink are not allowed to be stored or consumed in the production or warehouse area with the exception of water in a clear container. This includes the millwright shop and “block house.”
- No chewing gum, breath mints, or throat lozenges
- No food refuse including food packaging should be discarded in any waste container (i.e. dumpster, garbage can) outside of the designated break areas.
- Containers and packaging (shipping boxes, roll cores, totes etc.) shall not be repurposed, for example:
 - » A Pepsi can shall not be used to hold pens
 - » A coating tote shall not be used to collect trash

Personnel Hygiene – Disease Control

- Employees with persistent coughing and/or sneezing that present no other symptoms or diagnoses may remain at work, but must wear a surgical mask and see the Appleton Plant Nurse (if available).
- Anyone exhibiting signs of illness such as persistent sneezing, coughing, vomiting, diarrhea, and/or fever of over 100.4 degrees must report to Management immediately and will be excluded from working in food production at the discretion of Management and/or the Appleton Plant Nurse (if available).
 - » If Management or the Appleton Plant Nurse is not available, the on shift Leader/Mentor must contact Management (on shift Leader/Mentor will contact a salaried employee following protocol). Employees must be asymptomatic for a period of at least 24 hours and be seen by the Appleton Plant Nurse and/or provide a written Doctor's release in order to return to work.
- Anyone diagnosed with the following diseases will be restricted from working and contact with food contact packaging until receiving a written Doctor's release. Including but not limited to (at the determination of the Appleton Plant Nurse);
 - » Listeriosis
 - » Hepatitis A
 - » Norovirus
 - » Salmonellosis
 - » HUS – E. coli 0157.H7
 - » Shigella
- If employees are diagnosed with any of the diseases they should contact the Appleton Plant Nurse at 920-991-8717 and follow the Appleton Plant Call-in Line Procedures.

Personnel Hygiene – Bodily Fluid Spills

- Blood Borne Pathogen and Bodily Fluid spills are reported immediately to management who will assess, control and manage isolation of contaminated product and cleanup.
- Cleanup Procedures are documented in the Procedure 1B1.4 Blood Born Pathogen.
- Personnel shall be required to refrain from sneezing or coughing over raw materials, intermediate products or food packaging.
- Expectorating (spitting) shall be prohibited.
- Any blood or bodily fluid incident will be documented as part of a Safety Incident Investigation. OSHA requirements are not covered in this program.
- All injuries, including minor cuts, shall be treated immediately and in an appropriate manner.
 - » Dressings shall be controlled and changed at appropriate intervals
 - » Self-adhesive plasters shall not contaminate the product. They shall be differentiated from the product (e.g. by color).

Allergen Awareness and Control

- Materials classified as allergens must be controlled in a manner as to not contaminate the product being manufactured
- A percentage of end-use customers could have an allergic reaction that could be life threatening if they unknowingly come in contact with these allergens
- Examples of allergens that must be controlled during manufacturing and handling include:
 - » Milk
 - » Eggs
 - » Fish (e.g. bass, flounder, cod)
 - » Crustacean shellfish (e.g. crab, lobster, shrimp)
 - » Tree nuts (e.g. almonds, walnuts, pecans)
 - » Peanuts
 - » Wheat
 - » Soybeans

Allergen Awareness and Control

- Appvion uses allergen controls around four potential concerns:
 - » Personnel Practices – Hygiene, clothes, food, etc.
 - » Training and Awareness – Only trained individuals are allowed in 18 building
 - » Cross Contamination – Extensive HVAC work was completed in June 2020, building structures are on cleaning schedules, and annual sampling is done
 - » Receiving – Operators are trained to identify possible transit contamination and document their inspections
- Appvion's HACCP (Hazard Analysis and Critical Control Point) team is also trained in looking for allergens and risks within the manufacturing processes

Sanitation

- The sanitation program categorizes each tasks based on the food safety risk if not maintained in a sanitary manner, for example:

Task	Category	Frequency	
Food Packaging Contact Equipment and Utensils	Critical	Weekly	18 Coater TPM - BEC Routes
Building Structures	Critical	Annually	Champs PM
Other and Idled Production Equipment	Major	Annually	Champs PM
Walls and floors in the production area	Major	Monthly	18 Coater TPM - BEC Routes
Storage	General	Monthly	18 Coater TPM - BEC Routes
Core Racks and Misc. Equipment (i.e. Cores)	General	Quarterly	18 Coater TPM - BEC Routes
Wall Perimeters	General	Monthly	18 Coater TPM - BEC Routes
Grounds	General	2x/Year	Champs PM
Restrooms	Janitorial	Daily M-F	Contracted
Offices	Janitorial	Daily M-F	Contracted
Break room	Janitorial	Daily M-F	Contracted

Sanitation – Pest Control

- Pests are attracted to food and water sources, keeping interior and exterior areas clean reduces the risk

- Appvion employs an outside vendor to maintain and document all pest activity

- In order for 18-building to remain compliant:
 - » No Holes or openings are allowed in exterior walls, interior walls, or around pipes
 - » No open windows or doors without the use of appropriate screen size (nothing larger than a pen tip)
 - » No vegetation within 18-24” around the facility
 - » An 18” perimeter in storage and warehouse areas is to be maintained to reduce pest harborage locations

Chemical Control and Labeling

- The food contact product manufactured in 18 building must not be contaminated with any un-wanted chemicals or materials.

- Appvion maintains a chemical list of all chemicals used in the facility in which the chemicals are assigned a risk factor and control measures when necessary
 - » Only the Operations Lead is allowed to order chemicals for use in maintenance, cleaning, production, and the lab
 - » The Operations Lead also approves all janitorial chemicals the Facilities Manager requests, and is responsible for all chemical log updates

Chemical Control and Labeling

- Chemicals are broken into 5 categories:
 - » **Production Chemicals** (WD-40, Silicone Spray, Powerhouse, Big Orange, etc...)
 - ONLY stored in yellow chemical storage cabinets on the production floor, access limited.
 - Aerosol spray chemicals only to be used when the coater is shut down, if a chemical is needed during production a non-aerosol version needs to be found.
 - » **Sanitation Chemicals** (i.e. RTX-9 Turbo FG)
 - For Cleaning Production and Storage areas
 - When used on the coater must be followed by soap and water rinse
 - Stored in Designated Locations only
 - » **Maintenance Chemicals** (May include Production Chemicals, Grease, Oils, Welding Gases, etc...)
 - Stored in Maintenance Shop
 - Should only be present outside the maintenance shop when the coater is down for maintenance
 - » **Janitorial Chemicals**
 - Stored in Janitorial Closet
 - Only used by Janitorial Service to clean Offices, Break Rooms, and Restrooms
 - Disinfectant spray for employee use may be stored in the Restrooms.
 - » **Lab Chemicals** (i.e. Dyne Pens, HST Solution, etc...)
 - Stored in the Chemical Storage Cabinet in the lab.
 - Should only be used in the lab.

Chemical Control and Labeling

Identification

- All chemicals in their original containers must have a legible label identifying the actual contents
- Secondary use containers such as spray bottles must have legible identification of the contents and dilutions, if applicable
- Primary or secondary containers must have only one label identifying the contents. **All other labels must be removed**

Food Defense and Intentional Contamination

- Tampering, contaminating, or doing anything to the product, labeling, or packaging with the intent to cause harm is punishable as a felony
- Employees are key in identifying actual or potential food security issues, use industry safe to document an occurrence
 - » See Something, Say Something
- Only trained individuals can be in 18-building
 - » All approved contractors and service providers are on Appvion's "Contractor List," these individuals receive a card to show as proof they have completed the food safety training
 - » Visitors are required to sign in, complete training, and are under the supervision of an Appvion employee at all times
- All exterior doors are badge controlled and should never be left open
- Entry for visitors, employees and contractors is through keypad secured doors.

Food Defense and Intentional Contamination

Inbound Product Security

- All incoming shipments are inspected and results documented by a qualified unloader
- Product will be evaluated by the unloader for items such as:
 - » Evidence of tampering
 - » Allergens and other food safety risks
 - » Product security – Totes are sealed, product is protected, etc.
 - » Seals or locks are intact and match the bill of lading for full truckload shipments
 - » LTL loads are not required to be sealed but they will be inspected
 - » Product labeling is correct – Lots, part numbers, etc.
- If any issues are identified by the qualified unloader, a manager will be immediately notified, an 18 Building Non-Conformance will be completed, and the corrective action process initiated

Outbound Product Security

- All outbound shipments (full or LTL) receive seals or locks on trailers, are inspected by a qualified loader, and results recorded on an inspection sheet
- If any issues are identified by the qualified loader, a manager will be immediately notified and the corrective action process initiated

Closing Summary

- GMPs are a mandatory set of procedures that the US FDA requires when manufacturing food contact materials
- Food contact materials are produced in 18-Building therefore these GMPs are in place for the whole building
- These practices are in place to ensure that the finished product being manufactured does not make the food that it may come in contact with un-safe

Your cooperation with these GMPs is required and appreciated