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Morton Salt, Inc. & Windsor Salt Ltd.

Silver Springs, NY

Food Safety and Quality Information Packet

Introduction

With the growing number of individual questionnaires, Morton Salt, Inc. and Windsor Salt Ltd. have prepared this packet of information to meet our customers' food safety, quality and regulatory requirements. The following information is based on our current processes for the manufacture of human food grade salt products. We kindly ask our customers to use this packet in place of completion of individual forms. Thank you for considering Morton Salt, Inc. and Windsor Salt Ltd.

This packet is only applicable to the following human food grade products produced at Morton Salt's manufacturing facility located in Silver Springs, New York:

- Culinox 999® Salt
- TFC 999® Salt
- H.G. Blending Salt
- TFC H.G. Blending Salt
- Iodized Table Salt
- Plain Table Salt
- Purex® Salt
- TFC Purex® Salt
- Purex Fine Prepared Salt
- Star Flake Dendritic Salt
- Star Flake Dendritic ES Salt
- Star Flake Dendritic Iodized

For quality and food safety information regarding products not listed above, please reach out to us directly at TECHNICALDOCUMENTS@mortonsalt.com.

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Issued By: Mark Reynolds

Sr Mgr Corporate External FSQR & Audit

Signature:

Issued By: Rachel Halphen

FSQR Lead

Signature:

Site Overview and Contact Information

The Morton Salt – The Silver Springs facility was part of the Morton Salt Company, a Division of Morton International. The total size of the facility (all floors) is 31,767.82 square meters, but the facility uses only 19,068.34 square meters. The facility is on the outskirts of the Village of Silver Springs, a small rural community in western New York state. Tonnage produced annually by the facility is approximately 350,000.

Morton Salt Corporate Information

Address: 444 West Lake Street, Suite 2900
Chicago, Illinois 60606, USA
Phone: 312-807-2002
Email: BuyIndustrial@mortonsalt.com
Website: www.mortonsalt.com

Morton Salt – Silver Springs Facility Information

Address: 45 Ribaud Avenue East
Silver Springs, NY 14550-0342
Phone: 585-493-2511

Technical Documentation

Name: Technical Documents Team
Phone: 312-807-2000
Email: TechnicalDocuments@mortonsalt.com

Sr Mgr Corporate External FSQR & Audit

Name: Mark Reynolds
Phone: 312-807-2000

FSQR Lead (Recall Contact)

Name: Rachel Halphen
Phone: 312-807-2014
Email: TECHNICALDOCUMENTS@mortonsalt.com

Director of B2B Food Sales

Name: Gary Bartuska
Email: foodb2bus@mortonsalt.com

24-Hour Emergency Contact

Phone: 312-807-2000

Overview of Quality and Food Safety Programs

At Morton Salt, we are committed to providing high quality products that meet or exceed the quality and food safety standards expected by our customers.

To ensure these expectations are fulfilled, we operate all our food manufacturing facilities according to the following regulatory requirements and internationally recognized quality and food safety standards:

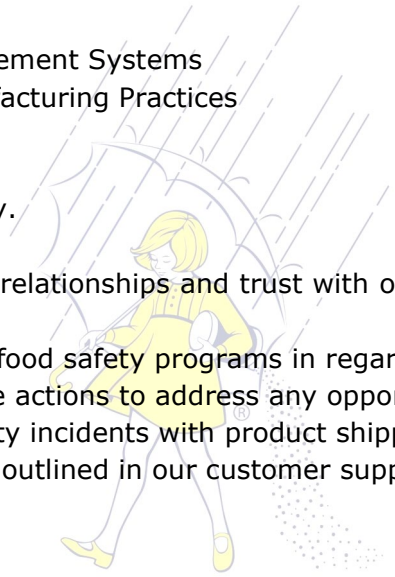
- U.S. Federal Food, Drug and Cosmetic Act, and all regulations and amendments thereto, including the Food Additives Amendment and the Food Safety Modernization Act;
- Health Canada Food and Drug Act and regulations and amendments thereto;
- BRC Global Standard for Food Safety: Issue 8.

Specific programs in place to support the above requirements include, but are not limited to:

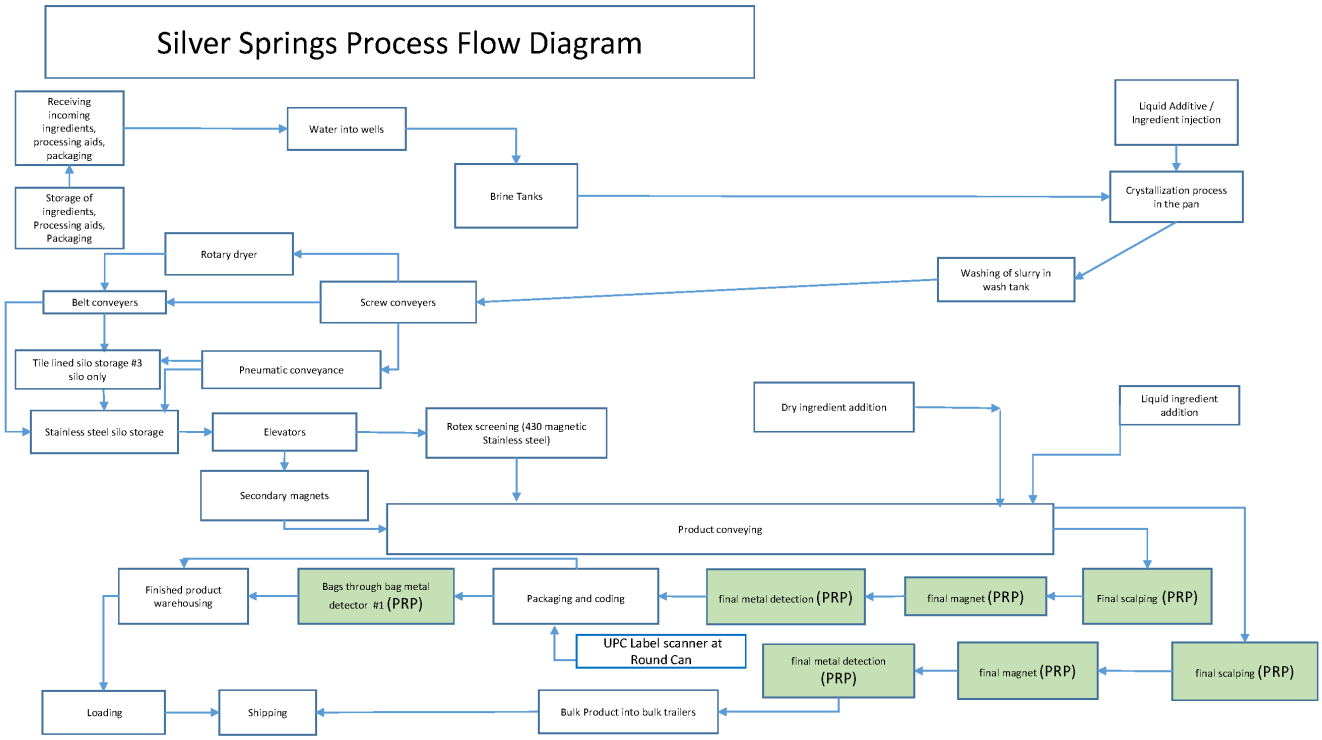
- Senior Management Commitment
- Food Safety / HACCP Plans
- Food Safety and Quality Management Systems
- Site Standards and Good Manufacturing Practices
- Product and Process Controls
- Personnel and Training
- Food Defense and Food Security.

We are also committed to building relationships and trust with our customers through the following activities:

- Review of Morton's quality and food safety programs in regards to customer expectations;
- Mutually agreed upon corrective actions to address any opportunities for improvement identified during customer audits or quality incidents with product shipped to the customer;
- Adherence to the specifications outlined in our customer supply agreements and contracts.



Flow Chart and HACCP/Food Safety Plan Summary



Copies of the Food Safety / HACCP programs are not distributed outside of the organization due to the complexity and proprietary nature of the information. The following information is provided in an effort to remain responsive to our customers' need for information:

PC1 (CCP) – Metal Detector:

Limits: Product is dischagred when challanged with a maximum test piece size of: Ferrous-1.5 mm Non-Ferrous- 1.8 mm Stainless Steel-2.0 mm A maximum of three (3) diverts per two (2) hours of production. Test Frequency: Testing is conducted at production start and end, after repair, maintenance and adjustments.

Corrective Action: Failure results in product hold and investigation.

PC2 (CCP if no metal detector on line) – Final Magnet:

Limit is established as a loss of 23% and is tested annually,and unusual findings, checks are preformed by trained operators. Bulk loading checks are conducted after each trailer is loaded. Failure results in product hold and investigation.

CP – Final Scalping Screen:

(USS 12 mesh) Limit: an unusual amount or type or material larger than the screen openings. Four hour check are conducted by trrained operators that identify the screen is fully intact and there are no unsuall findings. Failure results in product hold and investigation.

Additional hazards are controlled by Prerequisite Programs (PRP) as part of the site's Food Safety Programs.

Additional Documents Available Upon Request

Please contact the Technical Documents Team or Customer Quality Manager for the following documents:

- Allergen Statement
- Business Continuity Statement
- Conflict Minerals Statement
- Continuing Product Guarantee
- Country of Origin Statement
- Diacetyl Statement
- Food Fraud Statement
- Food Grade Products Compliance Standard
- Food Packaging Materials Statement
- FSVP Statement
- GFSI Certificate and Audit Report
- HACCP / Preventive Controls Statement
- HALAL Statement
- Kosher Certificate
- Lot Code Explanation
- Notification of Change Statement
- Organic Statement
- Partially Hydrogenated Oil (PHO) Statement
- Pesticide Statement
- Proposition 65 Statement
- Quality Program Statement
- Ready to Eat Statement
- Safety Data Sheet
- Toxic Substance and Control Act (TSCA) Status

When requesting additional documents, please ensure that the manufacturing site and specific product for review is referenced in the request.

Frequently Asked Questions

Cleaning and Sanitation

Master Cleaning Program
Does the facility have a written master cleaning program established to ensure that all critical elements are adequately addressed to prevent cross-contamination?
☑ Yes ☐ No

Cleaning Chemicals
Does the facility have programs in place to ensure the concentration of sanitizer and cleaning chemicals is verified and complies with the manufacturer's recommended concentrations?
Not Applicable – The food grade lines at the site only utilize dry cleaning procedures; Chemicals are not used in the cleaning process.

Cleaning Equipment Storage
Does the facility have procedures in place to store cleaning equipment in an adequate way to prevent cross-contamination?
☑ Yes ☐ No

Pre-Operational Cleaning Inspection
Does the facility perform pre-operational visual inspections to confirm that equipment is cleaned before start-up of production?
☑ Yes ☐ No

Cleaning Effectiveness Verification
Does the facility have a written Environmental Monitoring Program (EMP) established to ensure the effectiveness of cleaning procedures is monitored?
☐ Yes ☑ No

Continuous Improvement and Complaints

Management of Change
Is a Management of Change program in place to mitigate risk associated with changes to facilities, operations or product?
☑ Yes ☐ No

Are hazards associated with changes identified and mitigated?
☑ Yes ☐ No

Is there a procedure in place to notify customers of major changes to materials or processes?
☑ Yes ☐ No

Continuous Improvement Procedures
Does the facility have a written program in place to continually improve upon its products and processes?
☑ Yes ☐ No

Customer Complaints Procedures
Does the facility have a written program in place to effectively respond to customer complaints and concerns, and to minimize the number of recurring complaints?
☑ Yes ☐ No

Does the facility track and trend complaints to identify improvement, as well as strengths and weaknesses?
☑ Yes ☐ No

Facility, Grounds and Operations

Grounds and Building Exterior

Are programs in place to ensure the plant grounds and building exterior are maintained so as to protect against pests and to avoid contamination of product or of the facility?

☑ Yes ☐ No

Building Interior

Are the interiors of the building designed, constructed and maintained so as to facilitate Good Manufacturing Practices (GMPs)?

☑ Yes ☐ No

Are programs in place to ensure interior areas and housekeeping practices maintained to ensure cleanliness of the facility and to prevent product contamination?

☑ Yes ☐ No

Utilities Management

Does the facility have programs to ensure safe provision of utility services in the food production area?

☑ Yes ☐ No

Equipment and Utensils

Have equipment and utensils been designed and constructed so as to prevent contamination of food products?

☑ Yes ☐ No

Hygienic Zoning

Does the facility have an established hygienic-zoning program designed to reduce the potential for cross-contamination of material and products?

☐ Yes ☑ No

Site only produces low risk products and allergens are not present within the production environment therefore not requiring a hygienic zoning program.

Maintenance Programs

Does the facility have an established corrective maintenance program to ensure repairs are properly completed?

☑ Yes ☐ No

Does the facility have an established corrective maintenance program to ensure repairs are properly completed?

☑ Yes ☐ No

Walkways, Permanent Ladders and Conveyors

Are all walkways, permanent ladders and conveyors over exposed products or open bins of ingredients shielded so as to protect product and packaging materials from possible contamination?

Not applicable. Walkways, ladders and conveyors are only utilized over covered/unexposed product areas.

Staff Facilities

Are programs in place to ensure break areas, locker-rooms, restrooms and wash-stations are maintained in a clean and sanitary condition?

☑ Yes ☐ No

Container Labelling

Are programs in place to ensure all containers for manufacturing use, including trash receptacles and spray bottles, are properly and legibly labelled and specify the intended contents?

☑ Yes ☐ No

Food Safety / HACCP Systems

Food Safety / HACCP Plan

Does the facility have a documented Food Safety and/or HACCP plan that has been signed by senior management?

☑ Yes ☐ No

Was the Food Safety / HACCP plan developed by a multidisciplinary team that has been formally trained in HACCP and food-safety principles?

☑ Yes ☐ No

Has a Process Flow Diagram been created for each product, indicating the Preventive Controls and/or Critical Control Points?

☑ Yes ☐ No

Was the Food Safety / HACCP plan created following the US FDA Food Safety Plan requirements and/or the 7 HACCP principles?

☑ Yes ☐ No

Food Safety / HACCP Plan Review

Does the facility have documented procedures in place to monitor and record Preventive Controls and/or Critical Control Points?

☑ Yes ☐ No

Does the facility have a documented program for reviewing the Food Safety / HACCP plan at a predetermined frequency?

☑ Yes ☐ No

Food Safety Plans are reviewed minimally at an annual frequency.

Does the facility carry out verification activities to confirm the efficiency and suitability of the Food Safety / HACCP plan?

☑ Yes ☐ No

Food Security/Defense and Food Fraud

Food Security/Defense Program

Does the facility have a written food security/defense program based on risk or threats established to prevent intentional harm to employees, products and processes?

☑ Yes ☐ No

Is the food security/defense program reviewed at least annually?

☑ Yes ☐ No

Food Fraud Program

Does the facility have a written food fraud program based on vulnerability assessment established?

☑ Yes ☐ No

Does the program list and define all control measures, frequency and responsibilities throughout the chain of custody?

☑ Yes ☐ No

Foreign Material Control

Foreign Material Controls

Does the facility have documented programs in place to ensure the detection and/or removal of foreign objects?

☑ Yes ☐ No

Are sieves or screens used as a method of foreign material detection and/or removal?

☑ Yes ☐ No

Are metal detectors used as a method of foreign material detection and/or removal?

☑ Yes ☐ No

Are magnets used as a method of foreign material detection and/or removal?

☑ Yes ☐ No

Is optical sorting equipment used as a method of foreign material detection and/or removal?

☐ Yes ☑ No

Is x-ray equipment used as a method of foreign material detection and/or removal?

☐ Yes ☑ No

Is other physical separation equipment used as a method of foreign material detection and/or removal?

☐ Yes ☑ No

Is a product rejection log maintained, including analysis and corrective actions?

☑ Yes ☐ No

Metal and Utensils Control

Does the facility have specific controls in place for sharp metal utensils that pose a potential risk to health in the event of contamination?

☑ Yes ☐ No

Lubricant Control

Does the facility have programs in place to ensure only food-grade lubricants are used in all food product contact surfaces?

☑ Yes ☐ No

Good Laboratory Practices (GLPs)

In-House Testing Programs

Does the facility have a Good Laboratory Practice program established to ensure that only approved official test methods or established methods that have been validated and verified are used?

☑ Yes ☐ No

Does the facility have comprehensive testing programs and procedures developed with all important elements included?

☑ Yes ☐ No

If the facility tests for pathogens onsite, are strict control measures established?

Not applicable. Pathogen testing is not conducted onsite.

Are programs in place to ensure non-conforming results are tracked and corrective actions documented?

☑ Yes ☐ No

Third Party Laboratories

If third party laboratories are used to perform critical analysis, are the laboratories accredited and operated in accordance with ISO 17025?

☑ Yes ☐ No

Good Manufacturing Practices (GMPs)

GMP Program

Does the facility have a documented Good Manufacturing Practices (GMP) program established?

☑ Yes ☐ No

Hand-Washing Facilities

Does the facility provide adequate hand-washing facilities?

☑ Yes ☐ No

Employee Illness and Communicable Disease

Does the facility have documented procedures in place for the control of employee (including contractors and visitors) illness and communicable disease that may result in pathogen transmission by food?

☑ Yes ☐ No

Waste Management

Has the facility implemented a waste management program?

☑ Yes ☐ No

GMP Program Adherence

Does the facility have programs in place to ensure that all employees, visitors and contractors are knowledgeable and comply with GMP requirements?

☑ Yes ☐ No

GMP Inspections

Does the facility conduct self-audits on GMP elements at a predetermined frequency?

☑ Yes ☐ No

Monthly GMP inspections are conducted at the site.

Does the facility keep record of the audit results and any corrective actions?

☑ Yes ☐ No

Glass and Brittle/Hard Plastic Control

Does the facility have a documented procedure on the control of glass and brittle/hard plastic use, specifically banning the usage of glass or brittle/hard plastic except where use is essential?

☑ Yes ☐ No

Does the facility maintain a list of all essential glass and brittle/hard plastics within the facility, including all lights, glass and brittle/hard plastics in production, warehousing and storage area?

☑ Yes ☐ No

Chemical Control

Does the facility have written procedures in place to control the use, storage and handling or chemicals to prevent chemical contamination?

☑ Yes ☐ No

Pest Management Program

Pest Control Program

Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service?

☑ Yes ☐ No

Pesticides

Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides labels on file?

☑ Yes ☐ No

Is the pest controller's chemical application license current and readily available?

☑ Yes ☐ No

Inspection Reports

Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current?

☑ Yes ☐ No

Pest Control Devices

Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination?

☑ Yes ☐ No

Pest Activity Trend Analysis

Does the facility have programs in place to ensure pest activity trend analysis is reviewed and corrective actions are taken as necessary?

☑ Yes ☐ No

Process Control

Temperature Control

Does the facility have established temperature control measures for all temperature-sensitive products or ingredients?

Not applicable – products are not temperature sensitive.

Allergen and Sensitive Ingredient Controls

Does the facility have a written allergen management control procedure established to prevent cross-contact from allergenic material to non-allergenic material?

☑ Yes ☐ No

Allergens are not used in the production of products at the site.

Does the facility have a written sensitive ingredient program in place through the chain of custody to prevent cross-contact contamination?

☑ Yes ☐ No

Control of Non-Conforming Product

Does the facility have programs in place to identify, segregate and control the release of non-conforming product?

☑ Yes ☐ No

Corrective and Preventive Actions (CAPA)

Does the facility have written corrective and preventive action (CAPA) programs for tracking non-conformances to ensure they are corrected in a timely manner?

☑ Yes ☐ No

Finished Product Release

Does the facility have documented procedures for release of finished product to ensure proper release?

☑ Yes ☐ No

Operations Control

Does the facility have adequate operations controls in place with work instructions and specifications documented?

☑ Yes ☐ No

Quantity Control

Does the facility have documented programs in place to ensure appropriate weight/volume labelling by conducting weight, volume, and/or number control checks at a predetermined frequency?

☑ Yes ☐ No

Calibration Program

Are all instruments used that are critical to product safety, quality, or legality calibrated on a predetermined frequency based on risk?

☑ Yes ☐ No

Certificate of Analysis (COA)

Is the facility capable of providing a Certificate of Analysis (COA) attesting to the quality of the supplied material in accordance to the specified quality and food-safety attributes for each lot of delivered material?

☑ Yes ☐ No

Product Identification and Labelling

Product Identification

Does the facility have a written program indicating how each product is identified?

☑ Yes ☐ No

Product Labelling

Does the facility have a labelling program in place?

☑ Yes ☐ No

Does the facility have programs in place to clear line of labels during product changeovers?

☑ Yes ☐ No

Are checks in place to ensure the correct product, equipment and labels are used in an appropriate manner? ☑ Yes ☐ No

Quality Management System

Management Commitment

Does the facility's management team show commitment to quality in concrete ways (i.e. documented policies, quality manuals, provision of adequate resources, etc.)?

☑ Yes ☐ No

Document Control System

Does the facility have an established document control procedure?

☑ Yes ☐ No

Are programs in place to ensure that all the documents needed to demonstrate the quality management system in place kept up to date?

☑ Yes ☐ No

Record Control System

Does the facility have a documented record control procedure to ensure all food-safety and or quality records are maintained, so that evidence of legality and conformity to requirements is available?

☑ Yes ☐ No

Training Programs

Does the facility have a documented training program, which includes details of the type and frequency of training for all staff?

☑ Yes ☐ No

Regulatory Compliance

Is the facility registered with the United Stated FDA?

☑ Yes ☐ No

System Verification Audits

Does the facility operate an annual internal auditing program through which it can verify that the food-safety and quality plan is being operated effectively?

☑ Yes ☐ No

Does the facility participate in Third Party Food-Safety certification audits?

☑ Yes ☐ No

Receiving, Storage and Distribution

Receipt of Incoming Materials

Does the facility have a documented procedure on the receiving of incoming materials?

☑ Yes ☐ No

Raw Materials and Packaging Identification

Does the facility have documented procedures in place to ensure all raw materials and packaging materials are identified and clearly labelled?

☑ Yes ☐ No

Storage of Finished Goods

Does the facility have documented procedures in place to ensure adequate management and control of finished product during storage and distribution?

☑ Yes ☐ No

Transportation Inspection and Verification

Are programs in place to ensure vehicles, carriers and transporters are inspected for loading, palletizing, and traceability to ensure the quality and safety of the products?

☑ Yes ☐ No

Are programs in place to ensure that all vehicles and trailers delivering products from the facility are properly sealed and/or secured from dispatch through delivery?

☑ Yes ☐ No

Are programs in place to ensure that all vehicles and trailers delivering product from the facility are appropriately cleaned out and inspected to prevent contamination from potential foreign objects or chemicals, and that all flows, walls and ceilings are clean and sanitary?

☑ Yes ☐ No

Is a trailer inspection form completed prior to shipment?

☑ Yes ☐ No

Supplier Approval Program

Does the facility have an established supplier approval program for all raw materials and packaging materials, clearly defining processes by which a supplier is approved?

☑ Yes ☐ No

Does the facility have a Foreign Supplier Verification Program (FSVP) for all foreign suppliers?

☑ Yes ☐ No

Traceability and Recall Programs

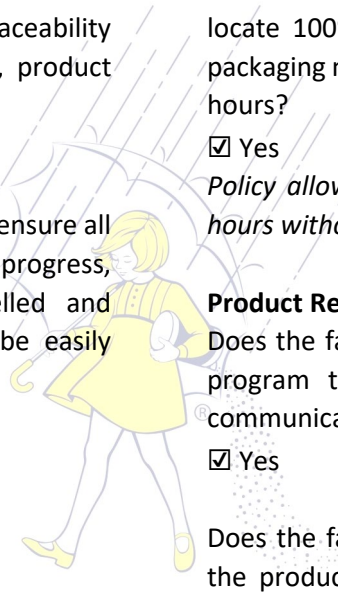
Traceability Program

Does the facility have a written traceability procedure established for all ingredients, product packaging, and finished products?

☑ Yes ☐ No

Does the facility have programs in place to ensure all raw materials, packaging materials, work in progress, and finished products are clearly labelled and identified in such a way that they can be easily tracked?

☑ Yes ☐ No



Does the facility have the ability to identify, track and locate 100% of raw materials, ingredients, and/or packaging materials to finished product sold within 4 hours?

☑ Yes ☐ No

Policy allows for 100% +/- 2% traceability within 4 hours without a corrective action.

Product Recall Program

Does the facility have a documented product recall program that defines the steps, personnel and communication plans for effective execution?

☑ Yes ☐ No

Does the facility have a written program to ensure the product traceability and recall procedures are tested at least annually and that all records are maintained?

☑ Yes ☐ No