

AIB INTERNATIONAL

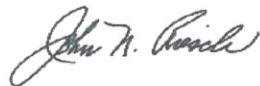
Announced
945/1000
The Platinum Packaging Group

Paramount, California

was inspected by a qualified AIB International Inspector on

September 6, 2018

under the requirements of the AIB International
Consolidated Standards for Food Contact Packaging Manufacturing Facilities.



Chairman of the Board



President and CEO



Vice President, Food Safety Services Americas



Vice President, Food Safety Services EAA

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AIB International GMP Inspection Results Report

Consolidated Standards for Inspection: Food Contact Packaging Manufacturing Facilities

Contacts	US Office:
	1213 Bakers Way PO Box 3999, Manhattan, KS 66502-3999 (785) 537-4750 • (800) 633-5137 • Fax (785) 537-0106
	UK Office:
	AIB International UK-LTD Riverbridge House Fetcham Grove Guildford Rd Leatherhead, Surrey, KT22 9AD, UK Phone: +44 (0) 1372 365 788 Fax: +44 (0) 1372 365 789
Website	http://www.aibonline.org



The AIB International Consolidated Standards for Inspection are statements that represent key requirements that a facility must meet in order to keep products manufactured, processed or handled in a facility wholesome and safe. The Standards reflect what an inspector would expect to see in a facility that maintains a food-safe processing environment.

This report details the findings from an AIB International inspection against the Consolidated Standards. The document contains the following sections:

Document Section	Description
Score and Rating	<ul style="list-style-type: none"> x Description of the facility x Number of findings and related risks x Category scores and total score x Rating
Participant Names	Personnel from the facility who accompanied the inspector
Facility-Specific Questions	Technical information about a facility. For example: bulk materials used, temperature control equipment used.
Location Matrices	Two matrices which categorize findings by Category and Risk
Findings with Risk	Descriptions and recommendations related to all findings
Additional Comments	Comments made by the inspector that have no risk assessment
Standards without identified Risks or Findings	Standards that are applicable to the inspected facility, but based on random review and observation samplings at the time of the inspection, the facility appears to be meeting requirements
Standards Not Applicable	Standards that are not applicable to the inspected facility



Score and Rating

Inspection Information:

Facility Name	The Platinum Packaging Group
Facility Address	7627 Somerset Blvd Paramount, California 90723 United States of America
Products Produced	Re-slitting of food contact film.
Account #	27105

Standard Used	Food Contact Packaging Manufacturing Facilities
Date(s) of Inspection	06-Sep-2018
Audit Type	GMP
Inspection Type	Scored
Announcement Type	Announced

Expected Scope	
Variations From Expected Scope	

Reinspection	No
Terminated	No

Score

Category	Minor Issues Noted (180-195)	Improvement Needed (160-175)	Serious (140-155)	Unsatisfactory <= 135	Scores
Operational Methods and Personnel Practices	0	0	0	0	200
Maintenance for Food Safety	1	1	0	0	175
Cleaning Practices	0	0	0	0	200
Integrated Pest Management	1	0	0	0	195
Adequacy of Prerequisite and Food Safety Programs	2	1	0	0	175
Total Score					945

Disclaimer: AIB International Inc. states that this report as dated and provided herein is to be construed as its findings and recommendations, category scores, total score, and rating. A passing score of 700 and above is not a certification of the facility, products, or programs. AIB International Inc. does not accept or assume responsibility for the Prerequisite and Food Safety Programs in effect with the customer named on the title page of this report (the customer). AIB International Inc. is only reporting the food safety conditions of the customer as of the date of this report and assumes no responsibility or liability as to whether the customer does or does not carry out the recommendations as contained in this report.

Participant Names

Name	Role	Inspection	Closing Meeting
Mr. Max Sanchez	Logistics Manager	Yes	Yes
Henry Weiss	Auditor	Yes	Yes

Facility-Specific Questions

#	Question	Comments
1.1	The Facility Specific Questions have been removed from this section of the report. The information that was previously provided here is now included in the body of the report.	See Report.

Findings by Location and Category

Locations	Operational Methods and Personnel Practices	Maintenance for Food Safety	Cleaning Practices	Integrated Pest Management	Adequacy of Prerequisite and Food Safety Programs	Totals by Location
Facility Overview	0	0	0	0	3	3
Raw Material Storage	0	1	0	0	0	1
Receiving Area	0	0	0	1	0	1
Support Areas	0	1	0	0	0	1
Totals by Category	0	2	0	1	3	6

Findings by Location and Risk

Locations	Minor Issues Noted	Improvement Needed	Serious	Unsatisfactory	Totals by Location
Facility Overview	2	1	0	0	3
Raw Material Storage	1	0	0	0	1
Receiving Area	1	0	0	0	1
Support Areas	0	1	0	0	1
Totals by Risk	4	2	0	0	6

Findings with Risk

#	Risk	Standard	Standard #	Requirement #	Location
1	Improvement Needed (IN) Finding: Recommendation:	Hand Washing Facilities Design Hot water was not always readily available in a timely manner at hand wash sinks. No hot water was available to the hand wash sinks in two restrooms. For the most effective hand washing, it was recommended that hot water be made available to all hand wash sinks.	2.20	2.20.1.1	Support Areas
2	Improvement Needed (IN) Finding: Recommendation:	Regulatory Affairs and Inspections Program The Regulatory Affairs and Inspection Program was not written or formalized. It was recommended that the facility develop a written Regulatory Affairs and Inspections Program that includes: a) A list of personnel delegated to accompany all inspectors; b) A policy regarding recording devices and cameras; and c) A policy regarding record and sample taking.	5.14	5.14.1.1	Facility Overview
3	Minor Issues Noted (MI) Finding: Recommendation:	Ceilings and Overhead Structures Evidence of loose materials, such as insulation, in the overheads was observed outside of the product zone. Multiple ceiling insulation panels were observed loose and hanging down in the warehouse area. No exposed products were stored in this location. No evidence of pest activity or cleaning issues were noted in this area. It was recommended that the ceiling panels be removed or re-attached to facilitate cleaning and to eliminate potential pest harborage areas.	2.7	2.7.1.8	Raw Material Storage
4	Minor Issues Noted (MI) Finding: Recommendation:	Identified pest activity Some evidence of pest activity was identified. Some spider webs were observed in a corner of warehouse #3, near large door. No live spiders were observed. It was recommended that the spider webs be removed, and the pest control contractor be notified.	4.16	4.16.1.2	Receiving Area
5	Minor Issues Noted (MI) Finding: Recommendation:	Self-Inspections The finding of issues, such as no hot water to two restrooms, spider webs in one corner, and loose ceiling panels, indicates that these need to be addressed in the Self-Inspection Program. It was recommended that the self-inspection audits be intensified so issues such as described above are identified and corrected in a timely manner.	5.4	5.4.1.2	Facility Overview
6	Minor Issues Noted (MI) Finding: Recommendation:	Written Procedure Audits The finding of a missing Regulatory Affairs and Inspections Program, indicates that this needs to be addressed in the Written Procedure Audits. It was recommended that the Written Procedures Audits be reviewed so all required programs are included.	5.5	5.5.1.1	Facility Overview

Additional Comments

#	Risk	Standard	Standard #	Requirement #	Location
1	Comments Finding:	Storage Practices Storage and removal practices were done in a way to prevent contamination. This facility re-sizes film. All materials and products were properly stored and handled.	1.3	1.3.1.1	Facility Overview
2	Comments Finding:	Cross Contamination Prevention The facility has implemented systems to reduce physical, chemical, and microbiological contamination risks. No issues were observed.	1.23	1.23.1.3	Facility Overview
3	Comments Finding:	Cleaning Tools and Utensils Cleaning tools and utensils were labeled or color-coded to separate them based on their intended use. All cleaning tools were properly identified and stored.	3.3	3.3.1.6	Facility Overview
4	Comments Finding:	Periodic Cleaning Tasks / Product Zone Cleaning Periodic cleaning tasks complied with written procedures and were properly completed. No issues were noted.	3.7	3.7.1.1	Facility Overview
5	Comments Finding:	Integrated Pest Management (IPM) Program A written Integrated Pest Management Program (IPM) was in place for this facility. The IPM Program was contracted to Commercial Pest Specialist.	4.1	4.1.1.1	Facility Overview
6	Comments Finding:	Facility Assessment Trained personnel conducted the facility assessment at least annually and records were current. The last assessment was conducted December 27, 2017.	4.2	4.2.1.1	Facility Overview
7	Comments Finding:	Pesticide Documentation Labels were provided for the pesticides listed as being applied at the facility. Labels were maintained for First Strike (EPA #7173-258) and Advion (EPA #100-1484).	4.5	4.5.1.1	Facility Overview
8	Comments Finding:	Accountability Written procedures were provided to meet legislative requirements and registrations as applicable were on file. This type of facility is not required to register under the FDA Bioterrorism Act. The business license from the City of Paramount is up-to-date.	5.1	5.1.1.3	Facility Overview
9	Comments Finding:	Food Defense Program Food Defense trained personnel had conducted a Vulnerability Assessment. This was reviewed at least annually or as required by regulations. The last review of the assessment was conducted August 7, 2018.	5.15	5.15.1.1	Facility Overview

10	Comments Finding:	Traceability Program The Traceability Program was tested twice annually, the test results were documented and included the actual results, success rate, timings, Corrective Actions and progress improvements where gaps in the program have been identified. The last traceability exercise was conducted August 9, 2018.	5.16	5.16.1.4	Facility Overview
11	Comments Finding:	Food Safety Plan The facility had identified applicable regulatory requirements for their Food Safety Plan. The facility has a formal HACCP Plan which was last reviewed June 10, 2018.	5.23	5.23.1.1	Facility Overview

Standards without identified Risks or Findings

Based on random review and observation samplings at the time of the inspection, the facility appears to be meeting the requirements of the following Standards:

Standard	Standard #	Standard Goal
Rejection of Shipments/Receipt of Dry Goods	1.1	Random review of records and programs related to safeguarding of products by identifying and barring entry to potentially contaminated materials indicate they met the requirements of the standard as applicable to this site.
Storage Practices	1.3	Materials appeared to be stored in a way that met the program requirements as defined by this site, as well as the applicable requirements in the standard.
Storage Conditions	1.4	Raw materials and finished products appeared to be stored in a clean storage area and were protected from contamination as observed during the inspection.
Raw Material/Finished Product Inventory	1.5	Raw material and finished product inventories appeared to be maintained at a reasonable volume. Random review of materials did not identify aged or infested materials during the inspection.
Pallets	1.6	Pallets examined were found to be clean and well maintained.
Material Transfer	1.12	Observation indicated that raw materials were transferred, handled, and managed at the time of inspection to prevent contamination of materials. This included transfer of materials to point of use and transfer of materials to secondary containers as applicable to the facility.
Waste Material Disposal	1.16	Waste material and waste material removal were managed to avoid product contamination.
Ingredient Containers, Utensils and Tools	1.17	Ingredient containers, utensils and tools were managed to prevent product contamination.
Workspace Arrangement	1.19	Workspace areas reviewed during the inspection were found to be clean and well maintained.
Single-Service Containers	1.20	Single-service containers appeared to be properly disposed of to prevent reuse.
Cross Contamination Prevention	1.23	Incompatible or hazardous materials observed during the inspection appeared to be segregated and handled to prevent product contamination.
Finished Product Transportation	1.25	Transportation and finished product coding randomly reviewed during the inspection was provided in a manner to allow traceability of materials. Transports examined during the inspection were found to be clean and in good condition.
Hand Washing Facilities	1.26	Hand washing facilities examined during the inspection appeared to be appropriately located, functional, and stocked to allow hand washing to occur.
Washrooms, Showers, and Locker Rooms	1.27	Employee welfare areas examined were maintained in good condition.
Personal Hygiene	1.28	No personal hygiene practices issues were identified during the inspection.

Work Clothes, Changing Facilities, and Personnel Areas	1.29	Appropriate clothing or uniforms were observed to be clean and in good condition. Changing facilities were provided.
Personal Items and Jewelry Control	1.31	No issues with the control of jewelry or personal items were identified during the inspection.
Health Conditions	1.32	Health policies were defined for the facility. No issues that were inconsistent with these policies were identified.
Non-Facility Personnel	1.33	Non-facility personnel were observed to be in compliance with the facility defined GMP Programs.
Facility Location	2.1	No evidence of issues from local activities or the facility location were identified during the inspection.
Outside Grounds and Roof	2.2	Facility grounds appeared to be well maintained. No issues were identified.
Layout	2.3	No issues with placement of equipment and structures were identified. Appropriate access for cleaning, inspection, and maintenance activities was noted.
Floors	2.4	Floor surfaces observed during the inspection were found to be in good condition.
Drains	2.5	Drains examined during the inspection were found to be in good condition.
Walls	2.6	Walls examined during the inspection were found to be in good condition.
Glass, Brittle Plastics, and Ceramics Control	2.8	No issues with glass, brittle plastics, or ceramics were identified during the inspection.
Air Makeup Units	2.9	Filters and screens examined during the inspection were found to be well maintained and in good condition.
Pest Prevention	2.10	No identified issues with building maintenance were observed that would allow pest harborage or entry into the facility.
Leaks and Lubrication	2.11	Catch pans or other devices were provided to protect product from contamination from lubrication or leaks.
Lubricants	2.12	Food-grade lubricants were identified for use on food contact packaging equipment and were labeled and segregated from non food-grade lubricants.
Cross Contamination Prevention	2.13	Segregation of operations based on process flow appeared to be practiced as observed during the inspection.
Equipment and Utensil Construction	2.14	Equipment and utensils observed during the inspection were designed and made of materials to allow easy cleaning and maintenance.
Temporary Repair Materials	2.15	Temporary repairs noted during the inspection were consistent with the facility defined program.
Compressed Air/Product Contact Gases	2.17	Compressed air or other gases were used in contact with product or product contact surfaces. Random review of records and observation indicated that filters were maintained or that purity

		was suitable to prevent contamination of product or product contact surfaces.
Transporting Equipment	2.18	Transporting equipment appeared to be well maintained at the time of the inspection.
Parts Storage	2.19	Parts were found to be clean and properly stored at the time of the inspection.
Wastewater Treatment and Sewage Disposal	2.23	Observations at the time of the inspection indicated that wastewater and sewage treatment systems were being properly maintained.
Cleaning	3.1	Cleaning appeared to be completed in a way to prevent contamination of raw materials, products, and equipment.
Cleaning Compounds and Sanitizers	3.2	Approval and verification procedures were in place for cleaning compounds and sanitizers used at the facility for product contact cleaning. Approval documentation was provided for the chemicals that were selected and reviewed.
Cleaning Tools and Utensils	3.3	Cleaning tools and utensils appeared to be managed and maintained to prevent product contamination. No issues were identified.
Cleaning Equipment	3.4	Cleaning equipment appeared to be managed and maintained to prevent product contamination. No issues were identified.
Daily (Housekeeping) Cleaning	3.5	No issues were identified with daily housekeeping practices observed during the inspection.
Operational Cleaning	3.6	Operational cleaning tasks were addressed and managed to prevent contamination. No issues were observed.
Periodic Cleaning Tasks / Product Zone Cleaning	3.7	Review of cleaning of product zone areas observed during the inspection indicated that these processes appeared to be effective. No issues were identified.
Maintenance Cleaning	3.8	Maintenance cleaning tasks were efficiently completed in a way that would not compromise product safety. This included removal of debris after maintenance work was complete, and accounting for small items such as nuts, bolts, washers, wire pieces, tape, welding rods and other.
Non-Product Zone and Support Area Cleaning	3.9	Non-product zone and support area cleaning appeared to be completed. No issues were identified.
Clean Out of Place (COP) Systems	3.11	Review of the Clean out of Place activities and random review of documentation and records indicated that the COP systems were efficiently followed as defined in the program.
Integrated Pest Management (IPM) Program	4.1	A written IPM Program outlining controls and processes to minimize pest activity were defined.
Facility Assessment	4.2	An annual assessment of the IPM Program was documented and current.
Scope of Service	4.3	The scope of service was clearly defined and included all applicable pest management activities for this facility.
Credentials and Competencies	4.4	Qualifications examined for selected IPM service providers were documented and current.

Pesticide Documentation	4.5	Pesticide labels and other applicable technical information were provided for the pesticides randomly examined during the inspection.
Pesticide Application Documentation	4.6	Pesticide application documentation was current and provided records to identify, document, and verify use of pesticides randomly examined during the inspection.
Trend Analysis	4.8	Service records of monitoring devices and pest sightings reviewed appeared to be used to identify and eliminate areas of pest activity as noted by the lack of significant activity observed during the inspection.
Monitoring Device Documentation	4.9	Monitoring devices were mapped and maintained to ensure proper placement and monitoring for pest activity and trending. The map appeared to be current based on observation during the inspection.
Exterior Rodent Monitoring Devices	4.10	Exterior rodent control devices were placed and those randomly reviewed were maintained to provide rodent monitoring and to deter entry into the facility.
Interior Rodent Monitoring Devices	4.11	Interior rodent monitoring devices were placed and those randomly reviewed were maintained to identify and capture rodents that have gained access to the facility.
Insect Light Traps	4.12	Insect light traps were provided and those reviewed were maintained to identify and monitor flying insects in the facility.
Bird Control	4.14	Bird control activities were addressed and the lack of activity noted during the inspection indicated that the program was effective.
Wildlife Control	4.15	No issues with identification or elimination of wildlife habitat were noted.
Accountability	5.1	Management authorization and support of supervisory compliance to programs, laws, and regulations was defined for this site and appeared to be implemented.
Support	5.2	Human and financial resources were provided to support implementation of the Prerequisite and Product Safety Programs.
Training and Education	5.3	Regularly scheduled training activities were documented and consistently carried out to ensure appropriate implementation of Prerequisite and Product Safety Programs at this facility. Records of training that were randomly reviewed were current.
Customer Complaint Program	5.6	A Customer Complaint Program was implemented to respond to customer concerns. Protocols were in place to ensure that product safety issues were responded to in a prompt and effective manner, whether it be at the facility level or as managed by corporate.
Chemical Control Program	5.7	A documented Chemical Control Program was implemented to provide a centralized approach to manage and control purchase and use of nonfood chemicals. Random review of chemicals and program requirements indicated that this program had been implemented as applicable for this facility.
Allergen Control Program	5.9	Allergen controls were implemented to identify allergen control throughout the process from receiving to distribution of product. Random review of the program, records, and observations

		during the inspection indicated that the program was implemented.
Glass, Brittle Plastics, and Ceramics Program	5.10	A documented Glass, Brittle Plastics, and Ceramics Program was provided to identify processes that prevent contamination of product. There were no identified deficiencies noted during the inspection to indicate that the program was ineffective.
Cleaning Program	5.11	A Cleaning Program with schedules and procedures for accomplishing cleaning tasks critical to maintenance of the processing environment was documented. Random review of schedules and cleaning procedures, in addition to observations, indicated that the program appeared to be effective.
Preventive Maintenance Program	5.12	A Preventive Maintenance Program that addressed building, utensil, and equipment construction and maintenance to ensure safe food contact packaging production was implemented. Observations noted during the inspection indicated that this program appeared to be effectively carried out.
Receiving Program	5.13	The Receiving Program implemented at the facility outlined and identified requirements for the raw materials received at this site. Random review of the program and documentation of receipt of materials indicated that materials receipts were consistent with the defined program requirements.
Food Defense Program	5.15	A Vulnerability Assessment was performed to identify and reduce the risk of intentional harm to the facility, its personnel, and products. No inconsistencies with the Food Defense Program, as defined for the facility, were identified during the inspection.
Traceability Program	5.16	The written Traceability Program defined the methodology to allow quick location of suspect raw materials, product contact packaging materials, rework, and related finished products.
Recall/Withdrawal Program	5.17	The written Recall/Withdrawal Program documented the procedures for quick and controlled recovery of product from the market. Random review of the records and mock recovery exercises indicated that the program was implemented as defined for this facility.
Nonconforming Product Program	5.18	The Nonconforming Products Program defined the guidelines for isolation, investigation, and disposition of raw materials, packaging materials, work-in-progress, returned goods, and finished products as applicable to the facility. Random review of records and observations during the inspection did not identify any current deficiencies with this program.
Approved Supplier Program	5.19	Evaluation of goods and services that impact the facility's product safety programs were managed as part of the Approved Supplier Program. Materials randomly selected and reviewed during the inspection appeared to meet program requirements.
Specification Program	5.20	Specifications that defined product safety requirements for raw materials, product contact packaging materials, processing aids, work-in-progress, and finished products were maintained, as applicable to this facility. Random review of materials indicated that facility defined program requirements were currently being met.
Letters of Guarantee or Certifications	5.21	Statements of assurance in the form of letters of guarantee or certifications were provided to indicate compliance to regulatory requirements for received materials and finished products.

		Records randomly reviewed indicated that the facility was currently meeting their program requirements.
Food Safety Plan	5.23	A Food Safety Plan that evaluated the hazards associated with the raw materials and processes related to product or food category was defined and implemented for the facility. This included the hazard analysis and identification of critical control points, as applicable, to prevent, eliminate, or reduce these hazards to an acceptable level. Random review of records indicated that the facility met the CCPs and/or Preventive Control requirements and that appropriate deviation procedures were implemented as identified by the program.
Design Standards	5.26	Structural and equipment design standards were implemented to aid in maintenance of product safety programs.
Water Quality	5.27	Water, water sources, and water management strategies were implemented to ensure safe water for product contact and use. Random reviews of the records indicated that programs were implemented.

Standards Not Applicable

Standard #	Standard Name
1.7	Carry-over and Rework
1.8	Dust Collection and Filtering Devices
1.9	Bulk Material Handling
1.11	Processing Aids
1.15	Foreign Material Control Devices
1.24	Cans, Bottles, and Rigid Packaging
1.35	Glass Container Breakage
1.41	Waxes, Sealants, Adhesives and Inks
2.21	Bulk Systems and Unloading Areas
4.7	Pesticide Control
4.13	Pheromone Monitoring Devices
5.8	Microbial Control Program
5.25	Release Procedures
5.28	Testing Requirements