

Food Safety: Appleton Plant

Contract and Visitor Training



Date: Updated January 2022

2022 Contractor/Visitor Orientation and Quiz

Appvion Rep to complete:

| | |
|----------------------|-------|
| Verify Answers | _____ |
| Green 2022 Card | _____ |
| Activate Access Card | _____ |
| Easy Lobby | _____ |
| Scan to SharePoint | _____ |

*Please PRINT Clearly

*NAME: _____ *Date _____

*CONTRACTOR/COMPANY: _____ Access Card # _____
(First 5 Digits)

*CELL PHONE: _____ *EMERGENCY CONTACT: _____ *PHONE: _____

VERIFIED BY APPVION CONTACT or EHS Manager: _____ SCORE: _____
(80% to PASS)

Agenda

- Introduction
- Food Safety Policy
- Personnel Hygiene
- Disease Control and Bodily Fluid Spills
- Allergen Awareness and Control
- Chemical Control and Labeling
- Food Defense and Intentional Contamination
- Glass and Brittle Plastic Control
- Miscellaneous
- Summary

Introduction

- Food Contact packaging materials are produced 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.
- The over-riding concept is that the food contact materials being produced must remain safe and sanitary as they pass through all operations from material unloading, coating application, rewinding, packaging thru to finished product loading.
- The following procedures are meant to keep all of the raw materials, coatings and base paper sanitary and free from contamination. Examples include un-wanted chemicals, pests, dirt, grime and bodily fluids.

APPLETON PLANT FOOD SAFETY POLICY

Letter of Commitment


We at Appvion Operations, 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!



Rob Belanger – Vice President of Manufacturing

January 21, 2021

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

- Employees will wear clean clothes. Cleanliness will be evaluated by the supervisor.
- No cut-off shirts or tank tops.
- No shorts, Capri's, etc. – Long pants required.
- No false nails or false eyelashes
 - » Fingernails shall be kept clean and trimmed.
 - » Fingernail polish should be intact and not 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

- Where gloves are used for food packaging contact, they shall be fit for purpose, clean 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

Personnel Hygiene – Food and Drink

- Food and Drink are not allowed to be stored or consumed in the production or warehouse area except for 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.

Personnel Hygiene – Disease Control

- Anyone exhibiting signs of illness such as persistent sneezing, coughing, vomiting, diarrhea, and/or fever of over 100.8 degrees must report to Management/Production Supervisor immediately.
- 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

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 (i.e., 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 (i.e., bass, flounder, cod)
 - » Crustacean shellfish (i.e., crab, lobster, shrimp)
 - » Tree nuts (i.e., almonds, walnuts, pecans)
 - » Peanuts
 - » Wheat
 - » Soybeans

Chemical Control and Labeling

Chemical List

- Only chemicals on the master chemical list are allowed in CM18 building.
- Any additional chemicals required in the building will need prior approval by Appvion.

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.

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.

- **Chemicals need to be in their designated home and only used during the specified times.**

Food Defense and Intentional Contamination

Visitor and Contractor Security

- Visitors are required to sign in and out on the automated Visitor Log Program and will be under the control of Appvion employees at all times.
- A visitor is defined as anyone who is not currently under contract or service agreements.
- Contractors and service providers with contracts and service agreements must provide a list of approved personnel which will be kept on file and updated as appropriate. (Contractor List). If contractors are not identified on the preapproved list, they must sign in as visitors.
- Tampering, contaminating, or doing anything to the product, labeling, or packaging with the intent to cause harm is punishable as a felony

Glass and Brittle Plastic Control

The following conditions are important for glass and hard plastic control

- Glass in office areas is allowed but cannot be taken into storage & production areas for any reason.
- No unprotected glass that is not on the glass inventory is allowed in the storage and production areas including watches, containers and cups.
- Glass in maintenance and parts areas are minimized and secured.
- Precautions will be taken to assure glass items will not be brought through warehouse areas. If required, any glass received at the dock will be closely monitored for breakage by Appvion personnel.
- Storage of glass or glass containing supplies such as replacement light bulbs will not be stored in storage or production areas.

Glass and Brittle Plastic Control

Glass Incident Cleanup & Reporting

- Contact an Appvion Manager immediately for any glass or brittle plastic incident.
- All glass incidents must be documented with immediate measures taken to control and isolate the incident area.
- Appvion standard work for Glass clean up will be followed by Appvion personnel.
- Next steps will include identification, isolation and disposition of any product that may be involved. Usually if there is breakage, anything including pallets and equipment within a 10 ft radius is at risk especially if activities have not ceased.
- Any product involved or at risk will be immediately destroyed or held and isolated via the Non-conforming product procedure for Food Safety Holds.

Miscellaneous

- 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/coating or coating totes shall not be used to collect trash.
- Personal lockers shall be maintained free from rubbish, soiled clothing, and food.
 - » Storing tools that contact Food Packaging in lockers is prohibited.

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 FDA designated portions of the 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

Quiz

1 – What is a GMP?

- a. Good Mill Procedure
- b. Good Manufacturing Practice
- c. Great Manufacturing Procedure
- d. General Manufacturing Practice

2 – Hand washing is required after:

- a. Every absence from the workstation
- b. Each break
- c. Using the restroom
- d. All the above

3 – Minimum hand hygiene requires:

- a. Washing 20 seconds, rinse 5 seconds
- b. Washing 5 seconds, rinse 20 seconds
- c. Rinse 20 seconds, wash 5 seconds
- d. Washing 10 seconds, rinse 10 seconds

Quiz

4 – Unplanned food safety maintenance should be submitted:

- a. As a safety incident
- b. In an email to maintenance
- c. In Champs as a “FDA Safety” work order class
- d. None of the above

5 – Shorts and tank tops are allowed in 18 building, True/False?

- a. True
- b. False

6 – Why are hairnets that cover hair completely and beard nets for beards, visible stubble, and mustaches extending more than $\frac{1}{4}$ ” below the mouth and cover all exposed hair required while in 18-Building?

- a. They are not required, this is a trick question
- b. Hair contamination is a food safety hazard, following these requirements helps manage that risk
- c. They protect your head and face from falling objects
- d. Hair contamination is not a food safety hazard, the hair and beard nets are actually optional.

Quiz

7 – Tom throws his empty food wrappers in a garbage can on CM18’s production floor, this is okay because he ate the food and it’s just wrappers, True/False?

- a. True
- b. False

8 – Which allergens are part of the Big 8 that must be controlled during manufacturing and handling:

- a. Eggs, Soybeans, Fish
- b. Milk, Peanuts, Wheat
- c. Crustacean Shellfish, Tree Nuts
- d. All the above

9 – Aerosol spray production chemicals can only be used when the coater is shut down, True/False?

- a. True
- b. False

Quiz

10 – Patrick was doing some touch up paint on guard rails in 18-Building during a maintenance down day, he finishes and needs to put the paint cans away, where should they be stored?

- a. Yellow flammable storage cabinet on the production floor
- b. In CM18's test station
- c. In the Maintenance Shop
- d. In the janitor's closet

11 – Tony from 17 Coater wants to drop off some facemasks to 18 Building but he hasn't completed the food safety training, can he come into 18 Building, Yes/No?

- a. Yes
- b. No

12 – Which of the below is acceptable by CM18?

- a. Loose items in pockets above the waste
- b. False fingernails
- c. Chewing gum
- d. Water in a clear container

Quiz

13 – Which is allowed on the production floor?

- a. Water in a clear container
- b. Coffee
- c. Medications
- d. Shorts

11 – Spitting is allowed in the warehouse as long as it gets into the garbage? True/False

- a. True
- b. False

12 – If you see broken glass immediately clean it up and throw it in the dumpster.

True/False

- a. True
- b. False